

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

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In re:

Case No.: 20-10322 CLB

The Diocese of Buffalo, N.Y.,

Chapter 11

Debtor.

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All Saints Roman Catholic Church Society of Buffalo, All Saints Roman Catholic Parish of Lockport, New York, Assumption Roman Catholic Church Society of Buffalo, N.Y., Assumption Hungarian R.C. Church Society of Lackawanna, Blessed Sacrament R.C. Church Society of Tonawanda Township, Blessed Sacrament Roman Catholic Church Society of Andover, Blessed Sacrament Roman Catholic Church Society of Delevan, N.Y. n/k/a St. Mary Roman Catholic Church Society of Arcade, N.Y., Blessed Sacrament Roman Catholic Church Society of Tonawanda, Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., Catholic Society of St. Mary's Church, Lockport, NY n/k/a All Saints Roman Catholic Parish of Lockport, New York, Church of Christ, the King, Church of the Holy Trinity Dunkirk N.Y., Church of St. John Baptist of West Valley, N.Y., Coronation of the Blessed Virgin Mary Roman Catholic Church Society of Buffalo, N.Y., Holy Apostles Peter and Paul Roman Catholic Church Society of Buffalo, N.Y. n/k/a St. Clare Roman Catholic Church Society Buffalo, N.Y., Holy Cross Roman Catholic Church Society of Buffalo, New York, Holy Family Roman Catholic Church Society, Holy Family Roman Catholic Church Society of Machias, N.Y. n/k/a St. Philomena's Roman Catholic Church Society of Franklinville, N.Y., Holy Name of Jesus Roman Catholic Church, Holy Spirit Roman Catholic Church Society of North Collins, N.Y., Holy Trinity Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Immaculate Conception Rom. Catholic Church Society of Buffalo n/k/a Holy Cross Roman Catholic Church Society of Buffalo, New York, Immaculate Conception Roman Catholic Church Society of Cassadaga, N.Y. n/k/a Saint Anthony's Roman Catholic Church Society of Fredonia New York, Immaculate Conception Roman Catholic Church Society of Eden Center, N.Y., Immaculate Conception, East Bethany n/k/a Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., Immaculate Heart of Mary Roman Catholic Church Society of Buffalo, New York n/k/a St. Aloysius

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Adversary Proceeding No.:

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Gonzaga Roman Catholic Church Society of Cheektowaga, New York, Incorporated, Infant of Prague Roman Catholic Church Society of Cheektowaga, New York, Most Precious Blood Rom. Cath. Church Society of Angola, Nativity of the Blessed Virgin Mary Roman Catholic Church Society of Harris Hill, N.Y., Nativity of the Blessed Virgin Roman Catholic Church Society of Buffalo n/k/a Our Lady of Hope Roman Catholic Parish of Buffalo, New York, Our Lady Help of Christians, East Bennington n/k/a Immaculate Heart of Mary Roman Catholic Parish, Our Lady Help of Christians Roman Catholic Church of Cheektowaga, New York, Our Lady of Czestochowa R.C. Church Society, Our Lady of Czestochowa Roman Catholic Church Society of Forks, Cheektowaga, Our Lady of Czestochowa Roman Catholic Church Society of North Tonawanda, New York, Our Lady of Fatima Roman Catholic Church Society of Elba, New York n/k/a Saint Padre Pio Roman Catholic Parish, Our Lady of Good Counsel Roman Catholic Church Society of Darien Center, N.Y. n/k/a Immaculate Heart of Mary Roman Catholic Parish, Our Lady of Grace Roman Catholic Church Society of Woodlawn, New York n/k/a Queen of Angels R.C. Church of Lackawanna, NY, Our Lady of Lebanon Roman Catholic Church Society of Niagara Falls n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Our Lady of Loretto Roman Catholic Church Society of Buffalo, New York, Incorporated n/k/a Our Lady of Hope Roman Catholic Parish of Buffalo, New York, Our Lady of Loretto Roman Catholic Church Society, Our Lady of Lourdes, Buffalo, Our Lady of Mount Carmel Roman Catholic Church Society of Niagara Falls, New York n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church of Niagara Falls, N.Y., Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., Our Lady of Mt. Carmel Roman Catholic Church Society of Brant, New York n/k/a Saint Anthony's Roman Catholic Church Society of Farnham, New York, Our Lady of Peace Roman Catholic Church Society of Clarence, Our Lady of Perpetual Help Roman Catholic Church Society of Buffalo, N.Y., Our Lady of Perpetual Help Roman Catholic Church Society of Lakeview n/k/a Blessed John Paul II Roman Catholic Parish Community, Our Lady of Pompeii Roman Catholic Church of Lancaster, Our Lady of Sacred Heart R.C. Church Society, Our Lady of the Angels Roman Catholic Church Society of Cuba, Our Lady of the Rosary Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Our Lady of the Sacred Heart of Jesus R.C. Church Society, Our Lady

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of Victory National Shrine, Lackawanna, Our Lady of Victory Roman Catholic Church Society of Frewsburg, N.Y. n/k/a St. James' Roman Catholic Church Society of Jamestown, N.Y., Our Mother of Good Counsel R.C. Church Society Inc., Our Mother of Good Counsel Roman Catholic Church Society of Blasdell, N.Y., Prince of Peace of Roman Catholic Church Society and St. Charles Borromeo Chapel n/k/a St. Vincent de Paul Roman Catholic Parish of Niagara Falls, New York, Queen of All Saints, Lackawanna, Queen of Heaven Roman Catholic Church Society, Inc., Queen of Heaven Roman Catholic Church Society of West Seneca, New York, Queen of the Most Holy Rosary, Buffalo, Queen of Martyrs Roman Catholic Church Society of Cheektowaga, New York, Resurrection Roman Catholic Church Society of Cheektowaga, New York, Roman Catholic Church of St. Mary's n/k/a St. Mary Roman Catholic Church Society of Arcade, N.Y., Sacred Heart of Jesus Roman Catholic Church Society of N. Collins, NY, Sacred Heart of Jesus Roman Catholic Church Society of Bowmansville, N.Y., Sacred Heart R.C. Church Society of Buffalo, NY, Sacred Heart Roman Catholic Church Society of Angelica, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., Sacred Heart Roman Catholic Church Society of Bennington, N.Y. n/k/a Immaculate Heart of Mary Roman Catholic Parish, Sacred Heart Roman Catholic Church Society of Friendship n/k/a Our Lady of Angels Roman Catholic Church Society of Cuba, Sacred Heart Roman Catholic Church Society of Lakewood, New York, Sacred Heart Roman Catholic Church Society of Portville, New York n/k/a The Church of St. Mary of the Angels, Olean, Sacred Heart Roman Catholic Church Society of Suspension Bridge, N.Y., Niagara Falls n/k/a St. Raphael's Roman Catholic Parish of Niagara Falls, N.Y., Saint Anthony's Roman Catholic Church Society of Farnham, New York, Saint Anthony's Roman Catholic Church Society of Fredonia New York, Saint Bernard's Roman Catholic Church Society of Buffalo, N.Y., Saint Casimir's Roman Catholic Church Society of Buffalo, N.Y., Saint Gerard's Roman Catholic Church Society of Buffalo, N.Y. n/k/a Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., Saint George's Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Saint John Gualbertus' Roman Catholic Church Society of Cheektowaga, Erie Co., N.Y., Saint Martin's Roman Catholic Church Society, Saint Nicholas Roman Catholic Church Society, Saint Patrick's Roman Catholic Church Society, Saint Patrick's

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Roman Catholic Church Society, Fillmore, Saints Peter and Paul's Church of Jamestown, N.Y. n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., Saints Peter and Paul's Roman Catholic Church Society of Williamsville, S. S. Peter & Paul's German Catholic Church Hamburg N.Y., SS. Peter and Paul Roman Catholic Church Society of Depew, New York n/k/a Our Lady of Pompeii Roman Catholic Church of Lancaster St. Adalbert's Rom. Cath. Church Society of Buffalo, N.Y. n/k/a St. John Kanty Roman Catholic Church Society of Buffalo, St. Agnes Catholic Church Society, Buffalo n/k/a St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., St. Ambrose's Roman Catholic Church of Buffalo n/k/a Our Lady of Charity Catholic Parish, St. Anthony's Roman Catholic Church Society of Buffalo St. Anthony's Roman Catholic Church Society of Batavia, N.Y. n/k/a Ascension Roman Catholic Parish of Batavia, N.Y., St. Anthony's Roman Catholic Church Society of Lackawanna, New York, St. Anthony's Roman Catholic Church Society of Lime Rock, New York n/k/a Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, St. Anthony's Roman Catholic Church Society of Lockport n/k/a All Saints Roman Catholic Parish of Lockport, New York, St. Albert the Great Roman Catholic Church Society of North Tonawanda, N.Y. n/k/a Saint Jude the Apostle Roman Catholic Parish of North Tonawanda, New York, St. Aloysius Church of Springville, St. Aloysius Gonzaga Roman Catholics Church Society of Cheektowaga, New York, St. Amelia's Roman Catholic Church Society of the Town of Tonawanda, N.Y., St. Andrew's Roman Catholic Church Society, St. Ann's Roman Catholic Church of Buffalo, N.Y. n/k/a Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., St. Augustine's Roman Catholic Church Society of Depew, N.Y. n/k/a Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, St. Augustine's Roman Catholic Church Society of Rapids-Clarence Center, New York n/k/a The Good Shepherd Roman Catholic Church Society of Pendleton, N.Y., St. Barbara's Roman Catholic Church Society n/k/a Queen of Angels R.C. Church of Lackawanna, N.Y., St. Barnabas Church Society of New York, St. Bartholomew's R.C. Church Society of Buffalo, NY, St. Benedict's Roman Catholic Church Society of Eggertsville, St. Bernadette R.C. Church Society of Armor, NY, St. Bernard's Roman Catholic Church Society of Youngstown, N.Y., St. Bonaventure's Roman Catholic Church Society of West Seneca, N.Y. n/k/a Saint John XXIII Roman Catholic Parish of West Seneca, New York, St. Bonaventure's Roman Catholic

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Church Society of Allegany, St. Boniface Roman Catholic Church Society, St. Brendan's Roman Catholic Church Society of Almond, N.Y., (Alfred), St. Bridget's Roman Catholic Church Society of Newfane, N.Y. n/k/a St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, St. Brigid, Buffalo, St. Brigid's Roman Catholic Church Society of Bergen, N.Y., formerly known as St. Bridget Bergen, St. Brigid's Roman Catholic Church Society, Inc., St. Cecilia's Church, Sheldon n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St. Cecilia's Roman Catholic Church Society of Oakfield, New York n/k/a Saint Padre Pio Roman Catholic Parish, St. Charles Borromeo Roman Catholic Church of Olcott, n/k/a St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, and Wilson, St. Charles Roman Catholic Church Society, St. Christopher's Roman Catholic Church Society of Tonawanda, St. Columba's Roman Catholic Church Society of Buffalo, N.Y. n/k/a Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., St. Edmund's Roman Catholic Church Society of Tonawanda, N.Y. n/k/a St. Christopher's Roman Catholic Church Society of Tonawanda, St. Elizabeth, Cherry Creek. St. Elizabeth's Roman Catholic Church of Buffalo, N.Y. n/k/a Assumption Roman Catholic Church Society of Buffalo, N.Y., St. Florian's Roman Catholic Church Society of Buffalo, N.Y. n/k/a All Saints Roman Catholic Church Society of Buffalo, St. Frances Cabrini Parish (Collins Center, NY) n/k/a Epiphany of Our Lord Roman Catholic Parish Community, Langford, N.Y, St. Francis Church Society of Tonawanda Village, Tonawanda, St. Francis de Sales, Buffalo, St. Francis of Assisi Roman Catholic Church Society of Athol Springs, New York, St. Francis of Assisi Roman Catholic Church Society of Corfu, New York n/k/a Saint Maximilian Kolbe Roman Catholic Parish of Corfu, N.Y., St. Francis of Assisi Roman Catholic Church Society of Buffalo n/k/a St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., St. Gabriel's Roman Catholic Church Society of Blossom, St. George's Roman Catholic Church Society, St. George's Roman Catholic Church Society of Jewettville, New York, St. Helen's Church n/k/a St. John's Roman Catholic Church Society of Olean, N.Y, St. Hyacinth Roman Catholic Church Society of Dunkirk N.Y. n/k/a Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., St. Hyacinth Roman Catholic Church Society of Dunkirk, New York n/k/a Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., St. Hyacinth's Roman Catholic Church Society of Lackawanna n/k/a Queen of Angels R.C. Church of Lackawanna, NY, St. Isidore's

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Roman Catholic Church Society of East Otto, N.Y., St. James' Roman Catholic Church Society of Depew, N.Y., n/k/a Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, St. James' Roman Catholic Church Society of Jamestown, N.Y. n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., St. James Major Roman Catholic Church Society of Westfield, N.Y. n/k/a St. Dominic Roman Catholic Church of Chautauqua, St. James' Roman Catholic Church Society of Buffalo, N.Y. n/k/a Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., St. Joachim, Buffalo, St. Joan of Arc Roman Catholic Church Society of Perrysburg, N.Y. n/k/a St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., St. John Baptist Roman Catholic Church Society of Carrollton, Vandalia n/k/a St. Bonaventure's Roman Catholic Church Society of Allegany, St. John Baptist's Rom. Cath. Church Society of Boston, N.Y., St. John Bosco Roman Catholic Church Society of Sheridan, N.Y. n/k/a Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., St. John Cantius R.C. Church Society, St. John De La Salle Roman Catholic Church of LaSalle, N.Y., St. John Fisher Roman Catholic Church Society of South Dayton, N.Y. n/k/a St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., St. John Kanty Roman Catholic Church Society of Buffalo, St. John Maron Roman Catholic Church Society of Buffalo, New York, St. John of the Cross, Whitesville, St. John the Baptist R.C. Church Society of Alden Center, New York, St. John the Baptist Roman Catholic Church Society of Carrollton n/k/a St. Bonaventure's Roman Catholic Church Society of Allegany, St. John the Baptist Roman Catholic Church, Kenmore, N.Y., St. John the Baptist's Roman Catholic Church Society of N. Collins, NY, St. John the Evangelist Roman Catholic Church Society of Sinclairville, N.Y. n/k/a Saint Anthony's Roman Catholic Church Society of Fredonia, St. John Vianney Roman Catholic Church Society of Orchard Park, N.Y., St. John's Roman Catholic Church Society of Jamestown n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., St. John's Roman Catholic Church Society of Olean, N.Y., St. Josephat's Roman Catholic Church of Cheektowaga, N.Y., St. Joseph New Cathedral, Buffalo, St. Joseph Roman Catholic Church Society of Albion, New York n/k/a Holy Family Roman Catholic Parish of Albion, N.Y., St. Joseph Roman Catholic Church Society of Lyndonville, N.Y. n/k/a Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., St. Joseph's Cath. Church of Holland, St. Joseph's R.C. Church, St.

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Joseph's Rom. Cath. Church Society of Batavia, N.Y., n/k/a  
Resurrection Roman Catholic Parish of Batavia, N.Y., St. Joseph's  
Roman Catholic Church Society of Bliss, N.Y. n/k/a Saint Isidore  
Roman Catholic Parish of Perry, New York, St. Joseph's Roman  
Catholic Society of Buffalo, NY, St. Josephs Roman Catholic  
Church of Fredonia, N.Y., St. Joseph's Roman Catholic Church  
Society of Gowanda, N.Y., St. Joseph's Roman Catholic Church  
Society of Leroy, New York n/k/a Our Lady of Mercy Roman  
Catholic Parish of LeRoy, St. Joseph's Roman Catholic Church  
Society of Lockport, N.Y., n/k/a All Saints Roman Catholic Parish  
of Lockport, New York, St. Joseph's Roman Catholic Church of  
Niagara Falls, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph  
Roman Catholic Church of Niagara Falls, N.Y., St. Joseph's  
Roman Catholic Church Society of North Tonawanda, New York  
n/k/a Our Lady of Czestochowa Roman Catholic Church Society  
of North Tonawanda, New York, St. Joseph's Roman Catholic  
Church Society of Perry (Wyom. Co. NY) n/k/a Saint Isidore  
Roman Catholic Parish of Perry, St. Jude's Roman Catholic  
Church Society of Sardinia, New York, St. Joseph's Roman  
Catholic Church Society of Scio, N.Y. n/k/a Holy Family of Jesus,  
Mary, and Joseph Roman Catholic Church Society of Belmont,  
N.Y., St. Joseph's Roman Catholic Church Society of Varysburg,  
New York n/k/a SS. Joachim & Anne Roman Catholic Church of  
Attica, New York, St. Lawrence's Roman Catholic Church  
Society of Buffalo, St. Leo's Roman Catholic Church Society, St.  
Leo the Great Roman Catholic Church, Amherst, New York, St.  
Leo's Roman Catholic Church Society of Niagara Falls, N.Y.  
n/k/a St. Vincent de Paul Roman Catholic Parish of Niagara Falls,  
New York, St. Leo's Roman Catholic Society of Eggertsville,  
N.Y., St. Louis Roman Catholic Church of Buffalo, N.Y., St.  
Lucy's Roman Catholic Church, St. Luke R.C. Church Society of  
Buffalo, NY, St. Margaret's Roman Catholic Church Society of  
Buffalo, New York, St. Mark's Roman Catholic Church Society of  
Buffalo, N.Y., St. Mark's Roman Catholic Church Society of  
Rushford, N.Y. n/k/a St. Patrick's Roman Catholic Church Society  
of Belfast, N.Y., St. Martin's Church Society Langford Erie  
County n/k/a Epiphany of Our Lord Roman Catholic Parish  
Community, Langford, N.Y., St. Mary Magdalene Roman  
Catholic Church Society, St. Mary of Immaculate Conception  
RCC Society, St. Mary of Lourdes Roman Catholic Church  
Society of Chautauqua, Bemus Point, St. Mary Redemptorist,  
Buffalo, St. Mary's Catholic Church Society of East Eden n/k/a St.  
John Baptist's Rom. Cath. Church Society of Boston, N.Y., St.

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Mary's Catholic Church Society of Pavilion, N.Y. n/k/a Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., St. Mary's Church of the Redemptorists of Buffalo, NY, St. Mary's of the Lake Roman Catholic Church Society of Mount Vernon, Hamburg, St. Mary's Roman Church Society n/k/a The St. John the Baptist Roman Cath Congregation, St. Mary's Roman Catholic Church Society of Batavia, N.Y. n/k/a Resurrection Roman Catholic Parish of Batavia, N.Y., St. Mary's Roman Catholic Church Society of Belmont, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., St. Mary's Roman Catholic Church Society of Bolivar, New York, St. Mary's Roman Catholic Church Society of Canaseraga, New York, St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y., St. Mary's Roman Catholic Church Society of Holley, St. Mary's Roman Catholic Church Society of Little Valley, N.Y. n/k/a St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y., St. Mary's Roman Catholic Church Society of Mayville, N.Y. n/k/a St. Mary of Lourdes Roman Catholic Church Society of Chautauqua, St. Mary's Roman Catholic Church Society of Medina, N.Y. n/k/a Holy Trinity Roman Catholic Church of Medina, New York, St. Mary's Roman Catholic Church Society of Niagara Falls, N.Y., St. Mary's Roman Catholic Church Society of Strykersville n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St. Mary's Roman Catholic Church Society of Swormville, St. Mary's Roman Catholic Church Society Silver Springs N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New York, St. Matthew's Roman Catholic Church Society, St. Michael Archangel Roman Catholic Church Society of Lackawanna n/k/a Queen of Angels R.C. Church of Lackawanna, NY, St. Michael's Roman Catholic Church Society of Buffalo, NY, St. Michael's Roman Catholic Church Society of Warsaw, N.Y., St. Michael's Roman Catholic Church Society of South Byron n/k/a St. Brigid's Roman Catholic Church Society of Bergen, N.Y., St. Monica's Roman Catholic Church Society, St. Nicholas Roman Catholic Congregation of North Javá N.Y. n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St. Pacificus Church & Cemetery Association of Humphrey n/k/a The Holy Name of Mary Roman Catholic Church Society of Ellicottville, N.Y., St. Patrick's Roman Catholic Church of Belfast, N.Y., St. Patrick Roman Catholic Church Society of Hartland n/k/a Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., St. Patrick's Roman Catholic Church Society of the City of Lockport, N.Y. n/k/a All Saints

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Roman Catholic Parish of Lockport, New York, St. Patrick's  
Roman Catholic Church Society of Limestone, N.Y. n/k/a Our  
Lady of Peace Salamanca, St. Patrick's Roman Catholic Church  
Society of Randolph, N. Y., St. Patrick's Roman Catholic Church  
Society of Salamanca, N.Y. n/k/a Our Lady of Peace Roman  
Catholic Parish of Salamanca, N.Y., St. Paul's Roman Catholic  
Church Society of Dayton, N.Y., St. Paul's Roman Catholic  
Church Society of Kenmore, St. Peter's Roman Catholic Church  
Society of Leroy n/k/a Our Lady of Mercy Roman Catholic Parish  
of LeRoy, New York, St. Philomena's Roman Catholic Church  
Society of Franklinville, N.Y., St. Pius X Roman Catholic Church  
Society of Town of Amherst, N.Y., SS. Rita and Patrick Roman  
Catholic Church Society of Buffalo, N.Y. n/k/a St. Clare Roman  
Catholic Church Society of Buffalo, N.Y., St. Rose of Lima  
Roman Catholic Church Society of Buffalo, St. Rose of Lima  
Roman Catholic Church of Forestville n/k/a Our Lady of Mount  
Carmel Roman Catholic Church Society of Silver Creek, N.Y., St.  
Stanislaus Church Society, St. Stanislaus Kostka's Roman  
Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine  
Mercy Roman Catholic Parish of Niagara Falls, N.Y., St.  
Stanislaus Kostka's Roman Catholic Church Society of Perry,  
N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New  
York, St. Stephen's Rom. Cath. Church Society of Buffalo n/k/a  
St. Clare Roman Catholic Church Society of Buffalo, N.Y., St.  
Stephen's Roman Catholic Church of Grand Island, N.Y., St.  
Stephen's Roman Catholic Church Society n/k/a Holy Trinity  
Roman Catholic Church of Medina, New York, St. Teresa of  
Avila Roman Catholic Church of Akron, NY, St. Teresa of the  
Infant Jesus Roman Catholic Church of Niagara Falls n/k/a St.  
Raphael's Roman Catholic Parish of Niagara Falls, N.Y., St.  
Teresa's Roman Catholic Church Society, St. Thomas Aquinas  
Roman Catholic Church Society of Buffalo, St. Thomas More,  
Ripley, St. Timothy's Roman Catholic Church Society of  
Tonawanda, N.Y., St. Valentine's Roman Catholic Church Society  
of Buffalo n/k/a St. Clare Roman Catholic Church Society of  
Buffalo, N.Y., St. Vincent de Paul Roman Catholic Church  
Society of Buffalo, St. Vincent's Roman Catholic Church Society  
of Attica, N.Y. n/k/a SS. Joachim & Anne Roman Catholic  
Church of Attica, New York, St. Vincent's Roman Catholic  
Church Society of North Evans n/k/a Saint John Paul II Roman  
Catholic Parish Community, St. Vincents Roman Catholic Church  
of Springbrook, N.Y., Sts. Agatha and Ambrose Roman Catholic  
Parish of Buffalo, N.Y. n/k/a Our Lady of Charity Catholic Parish,

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Sts. Peter and Paul R. C. Church Society Arcade, New York n/k/a  
St. Mary Roman Catholic Church Society of Arcade, N.Y., The  
Annunciation Roman Catholic Church Society of Buffalo, N.Y.  
n/k/a Our Lady of Hope Roman Catholic Parish of Buffalo, New  
York, The Ascension Roman Catholic Church Society of North  
Tonawanda n/k/a Saint Jude the Apostle Roman Catholic Parish of  
North Tonawanda, New York, The Assumption Roman Catholic  
Church Society of Albion n/k/a Holy Family Roman Catholic  
Parish of Albion, N.Y., The Assumption Roman Catholic Church  
Society of Portageville, N.Y. n/k/a Saint Isidore Roman Catholic  
Parish of Perry, New York, The Church of St. Mary of Angels,  
Olean, The Church of St. Mary of Sorrows n/k/a Sts. Columba-  
Brigid Roman Catholic Church of Buffalo, N.Y., The Church of  
the Assumption of Lancaster N.Y., The Good Shepherd Roman  
Catholic Church Society of Pendleton, N.Y., The Holy Cross  
Roman Catholic Church Society of Salamanca, New York n/k/a  
St. Patrick's Roman Catholic Church Society of Limestone, N.Y.,  
The Holy Family Roman Catholic Church Society of the City of  
Buffalo n/k/a Our Lady of Charity Catholic Parish, The Holy  
Fourteen Helpers of the Town of West Seneca, Middle Ebenezer,  
The Holy Name of Mary Roman Catholic Church Society of East  
Pembroke, N.Y. n/k/a Saint Maximilian Kolbe Roman Catholic  
Parish of Corfu, N.Y., The Holy Name of Mary Roman Catholic  
Church Society of Ellicottville, The Immaculate Conception  
Roman Catholic Church Society of East Aurora, N.Y., The  
Immaculate Conception Roman Catholic Church Society of  
Wellsville, N.Y., The Most Holy Redeemer Roman Catholic  
Church Society of Cheektowaga, N.Y. n/k/a St. Lawrence's  
Roman Catholic Church Society of Buffalo, The Nativity Roman  
Catholic Church Society of Orchard Park, New York, The Queen  
of Peace Roman Catholic Church Society of Buffalo n/k/a Saint  
John Gualbertus' Roman Catholic Church Society of  
Cheektowaga, Erie Co., N.Y., The Roman Catholic Church of St.  
Franciscus Xavarius, Buffalo n/k/a Assumption Roman Catholic  
Church Society of Buffalo, N.Y., The Sacred Heart of Jesus  
Roman Catholic Church Society of Batavia, New York n/k/a  
Ascension Roman Catholic Parish of Batavia, N.Y., The Sacred  
Heart of Jesus Roman Catholic Church Society of Dunkirk New  
York, The St. John Baptist's Society North Buffalo n/k/a  
Assumption Roman Catholic Church Society of Buffalo, N.Y.,  
The Visitation Roman Catholic Church Society of Buffalo N.Y.  
n/k/a St. Katharine Drexel Roman Catholic Church Society of  
Buffalo, N.Y., Transfiguration, Buffalo, Transfiguration Roman

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Catholic Church Society n/k/a St. John's Roman Catholic Church  
Society of Olean, N. Y., Trustees of St. Patrick Church, Town of  
Java n/k/a St. John Neumann Roman Catholic Church of  
Wyoming County, and The Diocese of Buffalo, N. Y.,

Plaintiffs,

v.

21st Century Premier Insurance Company (f/k/a National Ben  
Franklin Fire Insurance Co. of Pittsburgh, PA); Ace Property and  
Casualty Insurance (successor-in-interest to Aetna Insurance  
Company); Home Fire and Marine Insurance Company of  
California d/b/a Fireman's Fund Corporation; American  
Alternative Insurance Corporation (successor-in-interest to  
American Union Insurance Company of New York); American  
Automobile Insurance Company; American Guarantee and  
Liability Insurance Company; American Insurance Company;  
Arrowood Indemnity Company (successor-in-interest to  
American and Foreign Insurance Company, Eagle Indemnity  
Company of New York, Globe Indemnity Company, Phoenix  
Assurance Company of New York, New Amsterdam Casualty  
Company, and Safeguard Insurance Company); Bedivere  
Insurance Company (f/k/a Potomac Insurance Company and  
successor-in-interest to General Accident Insurance Company of  
America); Century Indemnity Company; Certain Underwriters at  
Lloyd's, London and Certain London Market Companies;  
Columbia Casualty Company; Continental Casualty Company;  
Continental Insurance Company (successor-in-interest to Boston  
Old Colony Insurance Company, Commercial Insurance  
Company of Newark, New Jersey (f/k/a Commercial Casualty  
Insurance Company), Fidelity and Casualty Company of New  
York, Glens Falls Insurance Company (f/k/a Fidelity-Phenix  
Insurance Company), and London Guarantee and Accident  
Company); Covenant Insurance Company (successor-in-interest  
of Covenant Mutual Insurance Company); Employers' Fire  
Insurance Company; Employers Insurance Company of Wausau  
(f/k/a Employers Insurance of Wausau A Mutual Company f/k/a  
Employers Mutual Liability Insurance Company of Wisconsin);  
Excelsior Insurance Company; Fair American Insurance and  
Reinsurance Company (f/k/a Putnam Reinsurance Company);  
Federal Insurance Company; Fireman's Fund Insurance  
Company; Great American Insurance Company (successor-in-  
interest to Agricultural Insurance Company); Great American

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Insurance Company of New York (successor-in-interest to American National Fire Insurance Company); Guarantee Mutual Assurance Co. of America; Hanover Insurance Company (successor-in-interest to Massachusetts Bonding and Insurance Company); Harford Mutual Insurance Company; Hartford Steam Boiler Inspection and Insurance Company; Indemnity Insurance Company of North America; Insurance Company of North America; Integon National Insurance Company (f/k/a Bankers and Shippers Insurance Company); Lamorak Insurance Company (f/k/a OneBeacon America Insurance Company f/k/a Commercial Union Insurance Company f/k/a Employers Commercial Union Insurance Company); Liberty Mutual Insurance Company; Merchants Mutual Insurance Company; Metropolitan Casualty Insurance Company; Michigan Millers Mutual Insurance Company; Middlesex Insurance Company (f/k/a Middlesex Mutual Insurance Company); National Surety Corporation; National Union Fire Insurance Company of Pittsburgh, PA; Nationwide Insurance Company of America; Nationwide Mutual Insurance Company (f/k/a Farm Bureau Mutual Automobile Insurance Company); New England Insurance Company (f/k/a New England Reinsurance Corporation); New Hampshire Insurance Company (f/k/a Mainland Insurance Company, successor-in-interest to New York Casualty Insurance Company); New Hampshire Insurance Company; New York Central Mutual Fire Insurance Company; NGM Insurance Company (successor-in-interest to National Grange Mutual Insurance Company); North River Insurance Company; Pawtucket Insurance Company; Peerless Insurance Company; Pennsylvania Lumbermens Mutual Insurance Company; Phoenix & London Assurance Limited; Phoenix Insurance Company; Providence Washington Insurance Company; Royal Globe Insurance Company; RSUI Indemnity Company (successor-in-interest to Buffalo Insurance Company); Selective Insurance Company of America (f/k/a Exchange Mutual Insurance Company f/k/a Exchange Mutual Indemnity Insurance Company); SPARTA Insurance Company (successor-in-interest to American Employers' Insurance Company); St. Paul Fire and Marine Insurance Company; St. Paul Mercury Insurance Company; The Hartford Financial Services Group (successor-in-interest to Hartford Accident and Indemnity Company and Hartford Fire Insurance Company); TIG Insurance Company (successor-in-interest to American Surety Company of New York); Travelers Casualty and Surety Company (successor-in-interest to Aetna Casualty and Surety Company); Traveler's

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Indemnity Company (successor-in-interest to Gulf Insurance Company); U.S. Fidelity and Guaranty Company; U.S. Fire Insurance Company; Unigard Insurance Company (successor-in-interest to Jamestown Mutual Insurance Company); Utica Mutual Insurance Company; Westport Insurance Corporation (successor-in-interest to the Manhattan Fire and Marine Insurance Company); Yorkshire Insurance Company of New York (f/k/a The Yorkshire Indemnity Company of New York); and Zurich American Insurance Company,

Defendants.

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## COMPLAINT

Plaintiffs All Saints Roman Catholic Church Society of Buffalo, All Saints Roman Catholic Parish of Lockport, New York, Assumption Roman Catholic Church Society of Buffalo, N.Y., Assumption Hungarian R.C. Church Society of Lackawanna, Blessed Sacrament R.C. Church Society of Tonawanda Township, Blessed Sacrament Roman Catholic Church Society of Andover, Blessed Sacrament Roman Catholic Church Society of Delevan, N.Y. n/k/a St. Mary Roman Catholic Church Society of Arcade, N.Y., Blessed Sacrament Roman Catholic Church Society of Tonawanda, Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., Catholic Society of St. Mary's Church, Lockport, NY n/k/a All Saints Roman Catholic Parish of Lockport, New York, Church of Christ, the King, Church of the Holy Trinity Dunkirk N.Y., Church of St. John Baptist of West Valley, N.Y., Coronation of the Blessed Virgin Mary Roman Catholic Church Society of Buffalo, N.Y., Holy Apostles Peter and Paul Roman Catholic Church Society of Buffalo, N.Y. n/k/a St. Clare Roman Catholic Church Society Buffalo, N.Y., Holy Cross Roman Catholic Church Society of Buffalo, New York, Holy Family Roman Catholic Church Society, Holy Family Roman Catholic Church Society of Machias, N.Y. n/k/a St. Philomena's Roman Catholic Church Society of Franklinville, N.Y., Holy Name of Jesus Roman Catholic Church, Holy Spirit Roman Catholic Church Society of North Collins, N.Y.,

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Holy Trinity Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Immaculate Conception Rom. Catholic Church Society of Buffalo n/k/a Holy Cross Roman Catholic Church Society of Buffalo, New York, Immaculate Conception Roman Catholic Church Society of Cassadaga, N.Y. n/k/a Saint Anthony's Roman Catholic Church Society of Fredonia New York, Immaculate Conception Roman Catholic Church Society of Eden Center, N.Y., Immaculate Conception, East Bethany n/k/a Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., Immaculate Heart of Mary Roman Catholic Church Society of Buffalo, New York n/k/a St. Aloysius Gonzaga Roman Catholic Church Society of Cheektowaga, New York, Incorporated, Infant of Prague Roman Catholic Church Society of Cheektowaga, New York, Most Precious Blood Rom. Cath. Church Society of Angola, Nativity of the Blessed Virgin Mary Roman Catholic Church Society of Harris Hill, N.Y., Nativity of the Blessed Virgin Roman Catholic Church Society of Buffalo n/k/a Our Lady of Hope Roman Catholic Parish of Buffalo, New York, Our Lady Help of Christians, East Bennington n/k/a Immaculate Heart of Mary Roman Catholic Parish, Our Lady Help of Christians Roman Catholic Church of Cheektowaga, New York, Our Lady of Czestochowa R.C. Church Society, Our Lady of Czestochowa Roman Catholic Church Society of Forks, Cheektowaga, Our Lady of Czestochowa Roman Catholic Church Society of North Tonawanda, New York, Our Lady of Fatima Roman Catholic Church Society of Elba, New York n/k/a Saint Padre Pio Roman Catholic Parish, Our Lady of Good Counsel Roman Catholic Church Society of Darien Center, N.Y. n/k/a Immaculate Heart of Mary Roman Catholic Parish, Our Lady of Grace Roman Catholic Church Society of Woodlawn, New York n/k/a Queen of Angels R.C. Church of Lackawanna, NY, Our Lady of Lebanon Roman Catholic Church Society of Niagara Falls n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Our Lady of Loretto

Roman Catholic Church Society of Buffalo, New York, Incorporated n/k/a Our Lady of Hope  
Roman Catholic Parish of Buffalo, New York, Our Lady of Loretto Roman Catholic Church  
Society, Our Lady of Lourdes, Buffalo, Our Lady of Mount Carmel Roman Catholic Church  
Society of Niagara Falls, New York n/k/a Holy Family of Jesus, Mary, and Joseph Roman  
Catholic Church of Niagara Falls, N.Y., Our Lady of Mount Carmel Roman Catholic Church  
Society of Silver Creek, N.Y., Our Lady of Mt. Carmel Roman Catholic Church Society of  
Brant, New York n/k/a Saint Anthony's Roman Catholic Church Society of Farnham, New York,  
Our Lady of Peace Roman Catholic Church Society of Clarence, Our Lady of Perpetual Help  
Roman Catholic Church Society of Buffalo, N.Y., Our Lady of Perpetual Help Roman Catholic  
Church Society of Lakeview n/k/a Blessed John Paul II Roman Catholic Parish Community, Our  
Lady of Pompeii Roman Catholic Church of Lancaster, Our Lady of Sacred Heart R.C. Church  
Society, Our Lady of the Angels Roman Catholic Church Society of Cuba, Our Lady of the  
Rosary Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman  
Catholic Parish of Niagara Falls, N.Y., Our Lady of the Sacred Heart of Jesus R.C. Church  
Society, Our Lady of Victory National Shrine, Lackawanna, Our Lady of Victory Roman  
Catholic Church Society of Frewsburg, N.Y. n/k/a St. James' Roman Catholic Church Society of  
Jamestown, N.Y., Our Mother of Good Counsel R.C. Church Society Inc., Our Mother of Good  
Counsel Roman Catholic Church Society of Blasdell, N.Y., Prince of Peace of Roman Catholic  
Church Society and St. Charles Borromeo Chapel n/k/a St. Vincent de Paul Roman Catholic  
Parish of Niagara Falls, New York, Queen of All Saints, Lackawanna, Queen of Heaven Roman  
Catholic Church Society, Inc., Queen of Heaven Roman Catholic Church Society of West  
Seneca, New York, Queen of the Most Holy Rosary, Buffalo, Queen of Martyrs Roman Catholic  
Church Society of Cheektowaga, New York, Resurrection Roman Catholic Church Society of

Cheektowaga, New York, Roman Catholic Church of St. Mary's n/k/a St. Mary Roman Catholic Church Society of Arcade, N.Y., Sacred Heart of Jesus Roman Catholic Church Society of N. Collins, NY, Sacred Heart of Jesus Roman Catholic Church Society of Bowmansville, N.Y., Sacred Heart R.C. Church Society of Buffalo, NY, Sacred Heart Roman Catholic Church Society of Angelica, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., Sacred Heart Roman Catholic Church Society of Bennington, N.Y. n/k/a Immaculate Heart of Mary Roman Catholic Parish, Sacred Heart Roman Catholic Church Society of Friendship n/k/a Our Lady of Angels Roman Catholic Church Society of Cuba, Sacred Heart Roman Catholic Church Society of Lakewood, New York, Sacred Heart Roman Catholic Church Society of Portville, New York n/k/a The Church of St. Mary of the Angels, Olean, Sacred Heart Roman Catholic Church Society of Suspension Bridge, N.Y., Niagara Falls n/k/a St. Raphael's Roman Catholic Parish of Niagara Falls, N.Y., Saint Anthony's Roman Catholic Church Society of Farnham, New York, Saint Anthony's Roman Catholic Church Society of Fredonia New York, Saint Bernard's Roman Catholic Church Society of Buffalo, N.Y., Saint Casimir's Roman Catholic Church Society of Buffalo, N.Y., Saint Gerard's Roman Catholic Church Society of Buffalo, N.Y. n/k/a Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., Saint George's Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., Saint John Gualbertus' Roman Catholic Church Society of Cheektowaga, Erie Co., N.Y., Saint Martin's Roman Catholic Church Society, Saint Nicholas Roman Catholic Church Society, Saint Patrick's Roman Catholic Church Society, Saint Patrick's Roman Catholic Church Society, Fillmore, Saints Peter and Paul's Church of Jamestown, N.Y. n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., Saints Peter and Paul's Roman Catholic Church Society of Williamsville, S. S. Peter &



Paul's German Catholic Church Hamburg N.Y., SS. Peter and Paul Roman Catholic Church Society of Depew, New York n/k/a Our Lady of Pompeii Roman Catholic Church of Lancaster St. Adalbert's Rom. Cath. Church Society of Buffalo, N.Y. n/k/a St. John Kanty Roman Catholic Church Society of Buffalo, St. Agnes Catholic Church Society, Buffalo n/k/a St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., St. Ambrose's Roman Catholic Church of Buffalo n/k/a Our Lady of Charity Catholic Parish, St. Anthony's Roman Catholic Church Society of Buffalo St. Anthony's Roman Catholic Church Society of Batavia, N.Y. n/k/a Ascension Roman Catholic Parish of Batavia, N.Y., St. Anthony's Roman Catholic Church Society of Lackawanna, New York, St. Anthony's Roman Catholic Church Society of Lime Rock, New York n/k/a Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, St. Anthony's Roman Catholic Church Society of Lockport n/k/a All Saints Roman Catholic Parish of Lockport, New York, St. Albert the Great Roman Catholic Church Society of North Tonawanda, N.Y. n/k/a Saint Jude the Apostle Roman Catholic Parish of North Tonawanda, New York, St. Aloysius Church of Springville, St. Aloysius Gonzaga Roman Catholics Church Society of Cheektowaga, New York, St. Amelia's Roman Catholic Church Society of the Town of Tonawanda, N.Y., St. Andrew's Roman Catholic Church Society, St. Ann's Roman Catholic Church of Buffalo, N.Y. n/k/a Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., St. Augustine's Roman Catholic Church Society of Depew, N.Y. n/k/a Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, St. Augustine's Roman Catholic Church Society of Rapids-Clarence Center, New York n/k/a The Good Shepherd Roman Catholic Church Society of Pendleton, N.Y., St. Barbara's Roman Catholic Church Society n/k/a Queen of Angels R.C. Church of Lackawanna, N.Y., St. Barnabas Church Society of New York, St. Bartholomew's R.C. Church Society of Buffalo, NY, St. Benedict's Roman Catholic Church

Society of Eggertsville, St. Bernadette R.C. Church Society of Armor, NY, St. Bernard's Roman Catholic Church Society of Youngstown, N.Y., St. Bonaventure's Roman Catholic Church Society of West Seneca, N.Y. n/k/a Saint John XXIII Roman Catholic Parish of West Seneca, New York, St. Bonaventure's Roman Catholic Church Society of Allegany, St. Boniface Roman Catholic Church Society, St. Brendan's Roman Catholic Church Society of Almond, N.Y., (Alfred), St. Bridget's Roman Catholic Church Society of Newfane, N.Y. n/k/a St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, St. Brigid, Buffalo, St. Brigid's Roman Catholic Church Society of Bergen, N.Y., formerly known as St. Bridget Bergen, St. Brigid's Roman Catholic Church Society, Inc., St. Cecilia's Church, Sheldon n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St. Cecilia's Roman Catholic Church Society of Oakfield, New York n/k/a Saint Padre Pio Roman Catholic Parish, St. Charles Borromeo Roman Catholic Church of Olcott, n/k/a St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, and Wilson, St. Charles Roman Catholic Church Society, St. Christopher's Roman Catholic Church Society of Tonawanda, St. Columba's Roman Catholic Church Society of Buffalo, N.Y. n/k/a Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., St. Edmund's Roman Catholic Church Society of Tonawanda, N.Y. n/k/a St. Christopher's Roman Catholic Church Society of Tonawanda, St. Elizabeth, Cherry Creek, St. Elizabeth's Roman Catholic Church of Buffalo, N.Y. n/k/a Assumption Roman Catholic Church Society of Buffalo, N.Y., St. Florian's Roman Catholic Church Society of Buffalo, N.Y. n/k/a All Saints Roman Catholic Church Society of Buffalo, St. Frances Cabrini Parish (Collins Center, NY) n/k/a Epiphany of Our Lord Roman Catholic Parish Community, Langford, N.Y, St. Francis Church Society of Tonawanda Village, Tonawanda, St. Francis de Sales, Buffalo, St. Francis of Assisi Roman Catholic Church Society of Athol Springs, New York, St. Francis of Assisi Roman

Catholic Church Society of Corfu, New York n/k/a Saint Maximilian Kolbe Roman Catholic Parish of Corfu, N.Y., St. Francis of Assisi Roman Catholic Church Society of Buffalo n/k/an/k/a St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., St. Gabriel's Roman Catholic Church Society of Blossom, St. George's Roman Catholic Church Society, St. George's Roman Catholic Church Society of Jewettville, New York, St. Helen's Church n/k/a St. John's Roman Catholic Church Society of Olean, N.Y, St. Hiacinth Roman Catholic Church Society of Dunkirk N.Y. n/k/a Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., St. Hyacinth Roman Catholic Church Society of Dunkirk, New York n/k/a Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., St. Hyacinth's Roman Catholic Church Society of Lackawanna n/k/a Queen of Angels R.C. Church of Lackawanna, NY, St. Isidore's Roman Catholic Church Society of East Otto, N.Y., St. James' Roman Catholic Church Society of Depew, N.Y., n/k/a Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, St. James' Roman Catholic Church Society of Jamestown, N.Y. n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., St. James Major Roman Catholic Church Society of Westfield, N.Y. n/k/a St. Dominic Roman Catholic Church of Chautauqua, St. James' Roman Catholic Church Society of Buffalo, N.Y. n/k/a Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., St. Joachim, Buffalo, St. Joan of Arc Roman Catholic Church Society of Perrysburg, N.Y. n/k/a St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., St. John Baptist Roman Catholic Church Society of Carrollton, Vandalia n/k/a St. Bonaventure's Roman Catholic Church Society of Allegany, St. John Baptist's Rom. Cath. Church Society of Boston, N.Y., St. John Bosco Roman Catholic Church Society of Sheridan, N.Y. n/k/a Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., St. John Cantius R.C. Church Society, St. John De La Salle Roman Catholic Church of LaSalle, N.Y., St. John Fisher Roman Catholic Church Society

of South Dayton, N.Y. n/k/a St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., St. John Kanty Roman Catholic Church Society of Buffalo, St. John Maron Roman Catholic Church Society of Buffalo, New York, St. John of the Cross, Whitesville, St. John the Baptist R.C. Church Society of Alden Center, New York, St. John the Baptist Roman Catholic Church Society of Carrollton n/k/a St. Bonaventure's Roman Catholic Church Society of Allegany, St. John the Baptist Roman Catholic Church, Kenmore, N.Y., St. John the Baptist's Roman Catholic Church Society of N. Collins, NY, St. John the Evangelist Roman Catholic Church Society of Sinclairville, N.Y. n/k/a Saint Anthony's Roman Catholic Church Society of Fredonia, St. John Vianney Roman Catholic Church Society of Orchard Park, N.Y., St. John's Roman Catholic Church Society of Jamestown n/k/a Holy Apostles Roman Catholic Parish of Jamestown, N.Y., St. John's Roman Catholic Church Society of Olean, N.Y., St. Josephat's Roman Catholic Church of Cheektowaga, N.Y., St. Joseph New Cathedral, Buffalo, St. Joseph Roman Catholic Church Society of Albion, New York n/k/a Holy Family Roman Catholic Parish of Albion, N.Y., St. Joseph Roman Catholic Church Society of Lyndonville, N.Y. n/k/a Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., St. Joseph's Cath. Church of Holland, St. Joseph's R.C. Church, St. Joseph's Rom. Cath. Church Society of Batavia, N.Y., n/k/a Resurrection Roman Catholic Parish of Batavia, N.Y., St. Joseph's Roman Catholic Church Society of Bliss, N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New York, St. Joseph's Roman Catholic Society of Buffalo, NY, St. Josephs Roman Catholic Church of Fredonia, N.Y., St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., St. Joseph's Roman Catholic Church Society of Leroy, New York n/k/a Our Lady of Mercy Roman Catholic Parish of LeRoy, St. Joseph's Roman Catholic Church Society of Lockport, N.Y., n/k/a All Saints Roman Catholic Parish of Lockport, New York, St. Joseph's Roman Catholic Church of

Niagara Falls, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church of  
Niagara Falls, N.Y., St. Joseph's Roman Catholic Church Society of North Tonawanda, New  
York n/k/a Our Lady of Czestochowa Roman Catholic Church Society of North Tonawanda,  
New York, St. Joseph's Roman Catholic Church Society of Perry (Wyom. Co. NY) n/k/a Saint  
Isidore Roman Catholic Parish of Perry, St. Jude's Roman Catholic Church Society of Sardinia,  
New York, St. Joseph's Roman Catholic Church Society of Scio, N.Y. n/k/a Holy Family of  
Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., St. Joseph's Roman  
Catholic Church Society of Varysburg, New York n/k/a SS. Joachim & Anne Roman Catholic  
Church of Attica, New York, St. Lawrence's Roman Catholic Church Society of Buffalo, St.  
Leo's Roman Catholic Church Society, St. Leo the Great Roman Catholic Church, Amherst,  
New York, St. Leo's Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a St. Vincent de  
Paul Roman Catholic Parish of Niagara Falls, New York, St. Leo's Roman Catholic Society of  
Egbertsville, N.Y., St. Louis Roman Catholic Church of Buffalo, N.Y., St. Lucy's Roman  
Catholic Church, St. Luke R.C. Church Society of Buffalo, NY, St. Margaret's Roman Catholic  
Church Society of Buffalo, New York, St. Mark's Roman Catholic Church Society of Buffalo,  
N.Y., St. Mark's Roman Catholic Church Society of Rushford, N.Y. n/k/a St. Patrick's Roman  
Catholic Church Society of Belfast, N.Y., St. Martin's Church Society Langford Erie County  
n/k/a Epiphany of Our Lord Roman Catholic Parish Community, Langford, N.Y., St. Mary  
Magdalene Roman Catholic Church Society, St. Mary of Immaculate Conception RCC Society,  
St. Mary of Lourdes Roman Catholic Church Society of Chautauqua, Bemus Point, St. Mary  
Redemptorist, Buffalo, St. Mary's Catholic Church Society of East Eden n/k/a St. John Baptist's  
Rom. Cath. Church Society of Boston, N.Y., St. Mary's Catholic Church Society of Pavilion,  
N.Y. n/k/a Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., St. Mary's Church of the

Redemptorists of Buffalo, NY, St. Mary's of the Lake Roman Catholic Church Society of Mount Vernon, Hamburg, St. Mary's Roman Church Society n/k/a The St. John the Baptist Roman Catholic Congregation, St. Mary's Roman Catholic Church Society of Batavia, N.Y. n/k/a Resurrection Roman Catholic Parish of Batavia, N.Y., St. Mary's Roman Catholic Church Society of Belmont, N.Y. n/k/a Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., St. Mary's Roman Catholic Church Society of Bolivar, New York, St. Mary's Roman Catholic Church Society of Canaseraga, New York, St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y., St. Mary's Roman Catholic Church Society of Holley, St. Mary's Roman Catholic Church Society of Little Valley, N.Y. n/k/a St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y., St. Mary's Roman Catholic Church Society of Mayville, N.Y. n/k/a St. Mary of Lourdes Roman Catholic Church Society of Chautauqua, St. Mary's Roman Catholic Church Society of Medina, N.Y. n/k/a Holy Trinity Roman Catholic Church of Medina, New York, St. Mary's Roman Catholic Church Society of Niagara Falls, N.Y., St. Mary's Roman Catholic Church Society of Strykersville n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St. Mary's Roman Catholic Church Society of Swormville, St. Mary's Roman Catholic Church Society Silver Springs N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New York, St. Matthew's Roman Catholic Church Society, St. Michael Archangel Roman Catholic Church Society of Lackawanna n/k/a Queen of Angels R.C. Church of Lackawanna, NY, St. Michael's Roman Catholic Church Society of Buffalo, NY, St. Michael's Roman Catholic Church Society of Warsaw, N.Y., St. Michael's Roman Catholic Church Society of South Byron n/k/a St. Brigid's Roman Catholic Church Society of Bergen, N.Y., St. Monica's Roman Catholic Church Society, St. Nicholas Roman Catholic Congregation of North Java N.Y. n/k/a St. John Neumann Roman Catholic Church of Wyoming County, St.

Pacificus Church & Cemetery Association of Humphrey n/k/a The Holy Name of Mary Roman Catholic Church Society of Ellicottville, N.Y., St. Patrick's Roman Catholic Church of Belfast, N.Y., St. Patrick Roman Catholic Church Society of Hartland n/k/a Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., St. Patrick's Roman Catholic Church Society of the City of Lockport, N.Y. n/k/a All Saints Roman Catholic Parish of Lockport, New York, St. Patrick's Roman Catholic Church Society of Limestone, N.Y. n/k/a Our Lady of Peace Salamanca, St. Patrick's Roman Catholic Church Society of Randolph, N. Y., St. Patrick's Roman Catholic Church Society of Salamanca, N.Y. n/k/a Our Lady of Peace Roman Catholic Parish of Salamanca, N.Y., St. Paul's Roman Catholic Church Society of Dayton, N.Y., St. Paul's Roman Catholic Church Society of Kenmore, St. Peter's Roman Catholic Church Society of Leroy n/k/a Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, St. Philomena's Roman Catholic Church Society of Franklinville, N.Y., St. Pius X Roman Catholic Church Society of Town of Amherst, N.Y., SS. Rita and Patrick Roman Catholic Church Society of Buffalo, N.Y. n/k/a St. Clare Roman Catholic Church Society of Buffalo, N.Y., St. Rose of Lima Roman Catholic Church Society of Buffalo, St. Rose of Lima Roman Catholic Church of Forestville n/k/a Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., St. Stanislaus Church Society, St. Stanislaus Kostka's Roman Catholic Church Society of Niagara Falls, N.Y. n/k/a Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., St. Stanislaus Kostka's Roman Catholic Church Society of Perry, N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New York, St. Stephen's Rom. Cath. Church Society of Buffalo n/k/a St. Clare Roman Catholic Church Society of Buffalo, N.Y., St. Stephen's Roman Catholic Church of Grand Island, N.Y., St. Stephen's Roman Catholic Church Society n/k/a Holy Trinity Roman Catholic Church of Medina, New York, St. Teresa of Avila Roman Catholic Church of

Akron, NY, St. Teresa of the Infant Jesus Roman Catholic Church of Niagara Falls n/k/a St. Raphael's Roman Catholic Parish of Niagara Falls, N.Y., St. Teresa's Roman Catholic Church Society, St. Thomas Aquinas Roman Catholic Church Society of Buffalo, St. Thomas More, Ripley, St. Timothy's Roman Catholic Church Society of Tonawanda, N.Y., St. Valentine's Roman Catholic Church Society of Buffalo n/k/a St. Clare Roman Catholic Church Society of Buffalo, N.Y., St. Vincent de Paul Roman Catholic Church Society of Buffalo, St. Vincent's Roman Catholic Church Society of Attica, N.Y. n/k/a SS. Joachim & Anne Roman Catholic Church of Attica, New York, St. Vincent's Roman Catholic Church Society of North Evans n/k/a Saint John Paul II Roman Catholic Parish Community, St. Vincents Roman Catholic Church of Springbrook, N.Y., Sts. Agatha and Ambrose Roman Catholic Parish of Buffalo, N.Y. n/k/a Our Lady of Charity Catholic Parish, Sts. Peter and Paul R. C. Church Society Arcade, New York n/k/a St. Mary Roman Catholic Church Society of Arcade, N.Y., The Annunciation Roman Catholic Church Society of Buffalo, N.Y. n/k/a Our Lady of Hope Roman Catholic Parish of Buffalo, New York, The Ascension Roman Catholic Church Society of North Tonawanda n/k/a Saint Jude the Apostle Roman Catholic Parish of North Tonawanda, New York, The Assumption Roman Catholic Church Society of Albion n/k/a Holy Family Roman Catholic Parish of Albion, N.Y., The Assumption Roman Catholic Church Society of Portageville, N.Y. n/k/a Saint Isidore Roman Catholic Parish of Perry, New York, The Church of St. Mary of Angels, Olean, The Church of St. Mary of Sorrows n/k/a Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., The Church of the Assumption of Lancaster N.Y., The Good Shepherd Roman Catholic Church Society of Pendleton, N.Y., The Holy Cross Roman Catholic Church Society of Salamanca, New York n/k/a St. Patrick's Roman Catholic Church Society of Limestone, N.Y., The Holy Family Roman Catholic Church Society of the City of Buffalo n/k/a Our Lady of



Charity Catholic Parish, The Holy Fourteen Helpers of the Town of West Seneca, Middle Ebenezer, The Holy Name of Mary Roman Catholic Church Society of East Pembroke, N.Y. n/k/a Saint Maximilian Kolbe Roman Catholic Parish of Corfu, N.Y., The Holy Name of Mary Roman Catholic Church Society of Ellicottville, The Immaculate Conception Roman Catholic Church Society of East Aurora, N.Y., The Immaculate Conception Roman Catholic Church Society of Wellsville, N.Y., The Most Holy Redeemer Roman Catholic Church Society of Cheektowaga, N.Y. n/k/a St. Lawrence's Roman Catholic Church Society of Buffalo, The Nativity Roman Catholic Church Society of Orchard Park, New York, The Queen of Peace Roman Catholic Church Society of Buffalo n/k/a Saint John Gualbertus' Roman Catholic Church Society of Cheektowaga, Erie Co., N.Y., The Roman Catholic Church of St. Franciscus Xavarius, Buffalo n/k/a Assumption Roman Catholic Church Society of Buffalo, N.Y., The Sacred Heart of Jesus Roman Catholic Church Society of Batavia, New York n/k/a Ascension Roman Catholic Parish of Batavia, N.Y., The Sacred Heart of Jesus Roman Catholic Church Society of Dunkirk New York, The St. John Baptist's Society North Buffalo n/k/a Assumption Roman Catholic Church Society of Buffalo, N.Y., The Visitation Roman Catholic Church Society of Buffalo N.Y. n/k/a St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., Transfiguration, Buffalo, Transfiguration Roman Catholic Church Society n/k/a St. John's Roman Catholic Church Society of Olean, N.Y., Trustees of St. Patrick Church, Town of Java n/k/a St. John Neumann Roman Catholic Church of Wyoming County (collectively "Plaintiffs" or "Parishes") and The Diocese of Buffalo, N.Y. (the "Diocese") named herein, by and through their attorneys, Elsaesser Anderson, Chtd., Woods Oviatt Gilman, LLP, and Blank Rome LLP bring this Complaint against 21st Century Premier Insurance Company (f/k/a National Ben Franklin Fire Insurance Co. of Pittsburgh, PA); Ace Property and Casualty Insurance (successor-

in-interest to Aetna Insurance Company); Home Fire and Marine Insurance Company of California d/b/a Fireman's Fund Corporation; American Alternative Insurance Corporation (successor-in-interest to American Union Insurance Company of New York); American Automobile Insurance Company; American Guarantee and Liability Insurance Company; American Insurance Company; Arrowood Indemnity Company (successor-in-interest to American and Foreign Insurance Company, Eagle Indemnity Company of New York, Globe Indemnity Company, Phoenix Assurance Company of New York, New Amsterdam Casualty Company, and Safeguard Insurance Company); Bedivere Insurance Company (f/k/a Potomac Insurance Company and successor-in-interest to General Accident Insurance Company of America); Century Indemnity Company; Certain Underwriters at Lloyd's, London and Certain London Market Companies; Columbia Casualty Company; Continental Casualty Company; Continental Insurance Company (successor-in-interest to Boston Old Colony Insurance Company, Commercial Insurance Company of Newark, New Jersey (f/k/a Commercial Casualty Insurance Company), Fidelity and Casualty Company of New York, Glens Falls Insurance Company (f/k/a Fidelity-Phenix Insurance Company), and London Guarantee and Accident Company); Covenant Insurance Company (successor-in-interest of Covenant Mutual Insurance Company); Employers' Fire Insurance Company; Employers Insurance Company of Wausau (f/k/a Employers Insurance of Wausau A Mutual Company f/k/a Employers Mutual Liability Insurance Company of Wisconsin); Excelsior Insurance Company; Fair American Insurance and Reinsurance Company (f/k/a Putnam Reinsurance Company); Federal Insurance Company; Fireman's Fund Insurance Company; Great American Insurance Company (successor-in-interest to Agricultural Insurance Company); Great American Insurance Company of New York (successor-in-interest to American National Fire Insurance Company); Guarantee Mutual

Assurance Co. of America; Hanover Insurance Company (successor-in-interest to Massachusetts Bonding and Insurance Company); Harford Mutual Insurance Company; Hartford Steam Boiler Inspection and Insurance Company; Indemnity Insurance Company of North America; Insurance Company of North America; Integon National Insurance Company (f/k/a Bankers and Shippers Insurance Company); Lamorak Insurance Company (f/k/a OneBeacon America Insurance Company f/k/a Commercial Union Insurance Company f/k/a Employers Commercial Union Insurance Company); Liberty Mutual Insurance Company; Merchants Mutual Insurance Company; Metropolitan Casualty Insurance Company; Michigan Millers Mutual Insurance Company; Middlesex Insurance Company (f/k/a Middlesex Mutual Insurance Company); National Surety Corporation; National Union Fire Insurance Company of Pittsburgh, PA; Nationwide Insurance Company of America; Nationwide Mutual Insurance Company (f/k/a Farm Bureau Mutual Automobile Insurance Company); New England Insurance Company (f/k/a New England Reinsurance Corporation); New Hampshire Insurance Company (f/k/a Mainland Insurance Company, successor-in-interest to New York Casualty Insurance Company); New Hampshire Insurance Company; New York Central Mutual Fire Insurance Company; NGM Insurance Company (successor-in-interest to National Grange Mutual Insurance Company); North River Insurance Company; Pawtucket Insurance Company; Peerless Insurance Company; Pennsylvania Lumbermens Mutual Insurance Company; Phoenix & London Assurance Limited; Phoenix Insurance Company; Providence Washington Insurance Company; Royal Globe Insurance Company; RSUI Indemnity Company (successor-in-interest to Buffalo Insurance Company); Selective Insurance Company of America (f/k/a Exchange Mutual Insurance Company f/k/a Exchange Mutual Indemnity Insurance Company); SPARTA Insurance Company (successor-in-interest to American Employers' Insurance Company); St. Paul Fire and Marine

Insurance Company; St. Paul Mercury Insurance Company; The Hartford Financial Services Group (successor-in-interest to Hartford Accident and Indemnity Company and Hartford Fire Insurance Company); TIG Insurance Company (successor-in-interest to American Surety Company of New York); Travelers Casualty and Surety Company (successor-in-interest to Aetna Casualty and Surety Company); Traveler's Indemnity Company (successor-in-interest to Gulf Insurance Company); U.S. Fidelity and Guaranty Company; U.S. Fire Insurance Company; Unigard Insurance Company (successor-in-interest to Jamestown Mutual Insurance Company); Utica Mutual Insurance Company; Westport Insurance Corporation (successor-in-interest to the Manhattan Fire and Marine Insurance Company); Yorkshire Insurance Company of New York (f/k/a The Yorkshire Indemnity Company of New York); and Zurich American Insurance Company (successor-in-interest to Maryland Casualty Company)(collectively, the "Insurers" or "Defendants") and alleges as follows:

### **BACKGROUND**

1. This is an action against the Insurers for breach of contract and declaratory judgment, seeking damages and a declaration of the rights, duties, and liabilities of the parties pursuant to the terms of certain insurance policies and/or certificates. Further, this is an action seeking declaratory relief to determine the extent of the rights of the above-named Debtor in said insurance policies and/or certificates and the extent to which those rights may be property of the estate under 11 U.S.C. § 541.

2. Effective August 14, 2019, the New York State Legislature enacted the Child Victims Act ("CVA"), which allows claimants to file and pursue previously time-barred claims alleging sexual abuse. Prior to the CVA, the statute of limitations prevented claimants from asserting such claims.

3. As a result of the CVA, multiple claims and suits have been alleged against the Parishes and/or the Diocese alleging that the Parishes and/or the Diocese are liable for damages stemming from their purported negligence in connection with the alleged sexual abuse injuries (the “Underlying Actions and Claims”).

4. As a result of the CVA, Underling Actions and Claims may continue to be alleged against the Parishes and/or Diocese alleging that the Parishes are liable for damages stemming from their purported negligence in connection with the alleged sexual abuse injuries.

## THE PARTIES

5. Plaintiff All Saints Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

6. Plaintiff All Saints Roman Catholic Parish of Lockport, New York, formerly known as St. Patrick Lockport, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

7. Plaintiff Assumption Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

8. Plaintiff Assumption Hungarian R.C. Church Society of Lackawanna is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

9. Plaintiff Blessed Sacrament R.C. Church Society of Tonawanda Township is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

10. Plaintiff Blessed Sacrament Roman Catholic Church Society of Andover is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

11. Plaintiff Blessed Sacrament Roman Catholic Church Society of Delevan, N.Y., now known as St. Mary Roman Catholic Church Society of Arcade, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

12. Plaintiff Blessed Sacrament Roman Catholic Church Society of Tonawanda is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

13. Plaintiff Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

14. Plaintiff Catholic Society of St. Mary's Church, Lockport, NY, now known as All Saints Roman Catholic Parish of Lockport, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

15. Plaintiff Church of Christ, the King is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

16. Plaintiff Church of the Holy Trinity Dunkirk N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

17. Plaintiff Church of St. John Baptist of West Valley, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

18. Plaintiff Coronation of the Blessed Virgin Mary Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

19. Plaintiff Holy Apostles Peter and Paul Roman Catholic Church Society of Buffalo, N.Y., now known as St. Clare Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

20. Plaintiff Holy Cross Roman Catholic Church Society of Buffalo, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

21. Plaintiff Holy Family Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

22. Plaintiff Holy Family Roman Catholic Church Society of Machias, N.Y., now known as St. Philomena's Roman Catholic Church Society of Franklinville, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

23. Plaintiff Holy Name of Jesus Roman Catholic Church Society is a not-of-profit religious corporation duly organized and existing under and by virtue of laws of that State of New York, with its principal place of business located in the State of New York.

24. Plaintiff Holy Spirit Roman Catholic Church Society of North Collins, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

25. Plaintiff Holy Trinity Roman Catholic Church Society of Niagara Falls, N.Y., now known as Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.



26. Plaintiff Immaculate Conception Rom. Catholic Church Society of Buffalo, now known as Holy Cross Roman Catholic Church Society of Buffalo, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

27. Plaintiff Immaculate Conception Roman Catholic Church Society of Cassadaga, N.Y., now known as Saint Anthony's Roman Catholic Church Society of Fredonia New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

28. Plaintiff Immaculate Conception Roman Catholic Church Society of Eden Center, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

29. Plaintiff Immaculate Conception, East Bethany, now known as Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

30. Plaintiff Immaculate Heart of Mary Roman. Catholic Church Society of Buffalo, New York, now known as St. Aloysius Gonzaga Roman Catholic Church Society of Cheektowaga, New York, Incorporated, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

31. Plaintiff Infant of Prague Roman Catholic Church Society of Cheektowaga, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of

the laws of the State of New York, with its principal place of business located in the State of New York.

32. Plaintiff Most Precious Blood Rom. Cath. Church Society of Angola is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

33. Plaintiff Nativity of the Blessed Virgin Mary Roman Catholic Church Society of Harris Hill, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

34. Plaintiff Nativity of the Blessed Virgin Roman Catholic Church Society of Buffalo, now known as Our Lady of Hope Roman Catholic Parish of Buffalo, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

35. Plaintiff Our Lady Help of Christians, East Bennington, now known as Immaculate Heart of Mary Roman Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

36. Plaintiff Our Lady Help of Christians Roman Catholic Church of Cheektowaga, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

37. Plaintiff Our Lady of Czestochowa R.C. Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

38. Plaintiff Our Lady of Czestochowa Roman Catholic Church Society of Forks, Cheektowaga is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

39. Plaintiff Our Lady of Czestochowa Roman Catholic Church Society of North Tonawanda, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

40. Plaintiff Our Lady of Fatima Roman Catholic Church Society of Elba, New York, now known as Saint Padre Pio Roman Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

41. Plaintiff Our Lady of Good Counsel Roman Catholic Church Society of Darien Center, N.Y., now known as Immaculate Heart of Mary Roman Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

42. Plaintiff Our Lady of Grace Roman Catholic Church Society of Woodlawn, New York, now known as Queen of Angels R.C. Church of Lackawanna, NY, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

43. Plaintiff Our Lady of Lebanon Roman Catholic Church Society of Niagara Falls, now known as Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

44. Plaintiff Our Lady of Loretto Roman Catholic Church Society of Buffalo, New York, Incorporated, now known as Our Lady of Hope Roman Catholic Parish of Buffalo, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

45. Plaintiff Our Lady of Loretto Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

46. Plaintiff Our Lady of Lourdes, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

47. Plaintiff Our Lady of Mount Carmel Roman Catholic Church Society of Niagara Falls, New York, now known as Holy Family of Jesus, Mary, and Joseph Roman Catholic Church of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

48. Plaintiff Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

49. Plaintiff Our Lady of Mt. Carmel Roman Catholic Church Society of Brant, New York, now known as Saint Anthony's Roman Catholic Church Society of Farnham, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the

laws of the State of New York, with its principal place of business located in the State of New York.

50. Plaintiff Our Lady of Peace Roman Catholic Church Society of Clarence is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

51. Plaintiff Our Lady of Perpetual Help Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

52. Plaintiff Our Lady of Perpetual Help Roman Catholic Church Society of Lakeview, now known as Blessed John Paul II Roman Catholic Parish Community, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

53. Plaintiff Our Lady of Pompeii Roman Catholic Church of Lancaster is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

54. Plaintiff Our Lady of Sacred Heart R.C. Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

55. Plaintiff Our Lady of the Angels Roman Catholic Church Society of Cuba is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

56. Plaintiff Our Lady of the Rosary Roman Catholic Church Society of Niagara Falls, N.Y., now known as Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., is a not-

for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

57. Plaintiff Our Lady of the Sacred Heart of Jesus R.C. Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

58. Plaintiff Our Lady of Victory National Shrine, Lackawanna is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

59. Plaintiff Our Lady of Victory Roman Catholic Church Society of Frewsburg, N.Y., now known as St. James' Roman Catholic Church Society of Jamestown, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

60. Plaintiff Our Mother of Good Counsel R.C. Church Society Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

61. Plaintiff Our Mother of Good Counsel Roman Catholic Church Society of Blasdell, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

62. Plaintiff Prince of Peace Roman Catholic Church Society and St. Charles Borromeo Chapel, Niagara Falls, now known as St. Vincent de Paul Roman Catholic Parish of Niagara Falls, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in State of New York.

63. Plaintiff Queen of All Saints, Lackawanna is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

64. Plaintiff Queen of Heaven Roman Catholic Church Society, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

65. Plaintiff Queen of Heaven Roman Catholic Church Society of West Seneca, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in State of New York.

66. Plaintiff Queen of the Most Holy Rosary, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in State of New York.

67. Plaintiff Queen of Martyrs Roman Catholic Church Society of Cheektowaga, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

68. Plaintiff Resurrection Roman Catholic Church Society of Cheektowaga, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in State of New York.

69. Plaintiff Roman Catholic Church of St. Mary's, now known as St. Mary Roman Catholic Church Society of Arcade, N.Y., is a not-for-profit religious corporation duly organized

and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

70. Plaintiff Sacred Heart of Jesus Roman Catholic Church Society of N. Collins, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

71. Plaintiff Sacred Heart of Jesus Roman Catholic Church Society of Bowmansville, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

72. Plaintiff Sacred Heart R.C. Church Society of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

73. Plaintiff Sacred Heart Roman Catholic Church Society of Angelica, N.Y., now known as Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

74. Plaintiff Sacred Heart Roman Catholic Church Society of Bennington, N.Y., now known as Immaculate Heart of Mary Roman Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

75. Plaintiff Sacred Heart Roman Catholic Church Society of Friendship, now known as Our Lady of Angels Roman Catholic Church Society of Cuba, is a not-for-profit religious



corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

76. Plaintiff Sacred Heart Roman Catholic Church Society of Lakewood, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

77. Plaintiff Sacred Heart Roman Catholic Church Society of Portville, New York, now known as The Church of St. Mary of the Angels, Olean, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

78. Plaintiff Sacred Heart Roman Catholic Church Society of Suspension Bridge, N.Y., Niagara Falls, now known as St. Raphael's Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

79. Plaintiff Saint Anthony's Roman Catholic Church Society of Farnham, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

80. Plaintiff Saint Anthony's Roman Catholic Church Society of Fredonia New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

81. Plaintiff Saint Bernard's Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

82. Plaintiff Saint Casimir's Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

83. Plaintiff Saint Gerard's Roman Catholic Church Society of Buffalo, N.Y., now known as Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

84. Plaintiff Saint George's Roman Catholic Church Society of Niagara Falls, N.Y., now known as Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

85. Plaintiff Saint John Gualbertus' Roman Catholic Church Society of Cheektowaga, Erie Co., N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

86. Plaintiff Saint Martin's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

87. Plaintiff Saint Nicholas Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

88. Plaintiff Saint Patrick's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

89. Plaintiff Saint Patrick's Roman Catholic Church Society, Fillmore is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

90. Plaintiff Saints Peter and Paul's Church of Jamestown, N.Y., now known as Holy Apostles Roman Catholic Parish of Jamestown, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

91. Plaintiff Saints Peter and Paul's Roman Catholic Church Society of Williamsville is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

92. Plaintiff S.S. Peter & Paul's German Catholic Church Hamburg N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

93. Plaintiff SS. Peter and Paul Roman Catholic Church Society of Depew, New York, now known as Our Lady of Pompeii Roman Catholic Church of Lancaster, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

94. Plaintiff St. Adalbert's Rom. Cath. Church Society of Buffalo, N.Y., now known as St. John Kanty Roman Catholic Church Society of Buffalo, is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

95. Plaintiff St. Agnes Catholic Church Society, Buffalo, now known as St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

96. Plaintiff St. Ambrose's Roman Catholic Church of Buffalo, now known as Our Lady of Charity Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

97. Plaintiff St. Anthony's Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

98. Plaintiff St. Anthony's Roman Catholic Church Society of Batavia, N.Y., now known as Ascension Roman Catholic Parish of Batavia, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

99. Plaintiff St. Anthony's Roman Catholic Church Society of Lackawanna, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

100. Plaintiff St. Anthony's Roman Catholic Church Society of Lime Rock, New York, now known as Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, is a not-

for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

101. Plaintiff St. Anthony's Roman Catholic Church Society of Lockport, now known as All Saints Roman Catholic Parish of Lockport, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

102. Plaintiff St. Albert the Great Roman Catholic Church Society of North Tonawanda, N.Y., now known as Saint Jude the Apostle Roman Catholic Parish of North Tonawanda, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

103. Plaintiff St. Aloysius Church of Springville is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

104. Plaintiff St. Aloysius Gonzaga Roman Catholics Church Society of Cheektowaga, New York, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

105. Plaintiff St. Amelia's Roman Catholic Church Society of the Town of Tonawanda, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

106. Plaintiff St. Andrew's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

107. Plaintiff St. Ann's Roman Catholic Church of Buffalo, N.Y., now known as Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

108. Plaintiff St. Augustine's Roman Catholic Church Society of Depew, N.Y., now known as Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

109. Plaintiff St. Augustine's Roman Catholic Church Society of Rapids-Clarence Center, New York, now known as The Good Shepherd Roman Catholic Church Society of Pendleton, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

110. Plaintiff St. Barbara's Roman Catholic Church Society, now known as Queen of Angels R.C. Church of Lackawanna, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

111. Plaintiff St. Barnabas Church Society of New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

112. Plaintiff St. Bartholomew's R.C. Church Society of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

113. Plaintiff St. Benedict's Roman Catholic Church Society of Eggertsville is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

114. Plaintiff St. Bernadette R.C. Church Society of Armor, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

115. Plaintiff St. Bernard's Roman Catholic Church Society of Youngstown, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

116. Plaintiff St. Bonaventure's Roman Catholic Church Society of West Seneca, N.Y., now known as Saint John XXIII Roman Catholic Parish of West Seneca, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

117. Plaintiff St. Bonaventure's Roman Catholic Church Society of Allegany is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

118. Plaintiff St. Boniface Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

119. Plaintiff St. Brendan's Roman Catholic Church Society of Almond, N.Y., (Alfred) is a not-for-profit religious corporation duly organized and existing under and by virtue

of the laws of the State of New York, with its principal place of business located in the State of New York.

120. Plaintiff St. Bridget's Roman Catholic Church Society of Newfane, N.Y., now known as St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

121. Plaintiff St. Brigid, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

122. Plaintiff St. Brigid's Roman Catholic Church Society of Bergen, N.Y., formerly known as St. Bridget Bergen, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

123. Plaintiff St. Brigid's Roman Catholic Church Society, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

124. Plaintiff St. Cecilia's Church, Sheldon, now known as St. John Neumann Roman Catholic Church of Wyoming County, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

125. Plaintiff St. Cecilia's Roman Catholic Church Society of Oakfield, New York, now known as Saint Padre Pio Roman Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.



126. Plaintiff St. Charles Borromeo Roman Catholic Church of Olcott, now known as St. Brendan on the Lake Roman Catholic Parish of Newfane, Olcott, and Wilson, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

127. Plaintiff St. Charles Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

128. Plaintiff St. Christopher's Roman Catholic Church Society of Tonawanda is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

129. Plaintiff St. Columba's Roman Catholic Church Society of Buffalo, N.Y., now known as Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

130. Plaintiff St. Edmund's Roman Catholic Church Society of Tonawanda, N.Y., now known as St. Christopher's Roman Catholic Church Society of Tonawanda, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

131. Plaintiff St. Elizabeth, Cherry Creek is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

132. Plaintiff St. Elizabeth's Roman Catholic Church of Buffalo, N.Y., now known as Assumption Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

133. Plaintiff St. Florian's Roman Catholic Church Society of Buffalo, N.Y., now known as All Saints Roman Catholic Church Society of Buffalo, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

134. Plaintiff St. Frances Cabrini Parish (Collins Center, NY) is a religious organization located in the State of New York and is now known as Epiphany of Our Lord Roman Catholic Parish Community, Langford, N.Y., a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

135. Plaintiff St. Francis Church Society of Tonawanda Village, Tonawanda is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

136. Plaintiff St. Francis de Sales, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

137. Plaintiff St. Francis of Assisi Roman Catholic Church Society of Athol Springs, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

138. Plaintiff St. Francis of Assisi Roman Catholic Church Society of Corfu, New York, now known as Saint Maximilian Kolbe Roman Catholic Parish of Corfu, N.Y., is a not-

for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

139. Plaintiff St. Francis of Assisi Roman Catholic Church Society of Buffalo, now known as St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

140. Plaintiff St. Gabriel's Roman Catholic Church Society of Blossom is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

141. Plaintiff St. George's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

142. Plaintiff St. George's Roman Catholic Church Society of Jewettville, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

143. Plaintiff St. Helen's Church (Hinsdale, NY) is a religious organization located in the State of New York and is now known as St. John's Roman Catholic Church Society of Olean, N.Y., a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

144. Plaintiff St. Hiacinth Roman Catholic Church Society of Dunkirk N.Y., now known as Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

145. Plaintiff St. Hyacinth Roman Catholic Church Society of Dunkirk, New York, now known as Blessed Mary Angela R.C. Parish of Dunkirk, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

146. Plaintiff St. Hyacinth's Roman Catholic Church Society of Lackawanna, now known as Queen of Angels R.C. Church of Lackawanna, NY, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

147. Plaintiff St. Isidore's Roman Catholic Church Society of East Otto, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

148. Plaintiff St. James' Roman Catholic Church Society of Depew, N.Y., now known as Blessed Mother Teresa of Calcutta Roman Catholic Parish of Depew, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

149. Plaintiff St. James' Roman Catholic Church Society of Jamestown, N.Y., now known as Holy Apostles Roman Catholic Parish of Jamestown, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

150. Plaintiff St. James Major Roman Catholic Church Society of Westfield, N.Y., now known as St. Dominic Roman Catholic Church of Chautauqua, is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

151. Plaintiff St. James' Roman Catholic Church Society of Buffalo, N.Y., now known as Blessed Trinity Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

152. Plaintiff St. Joachim, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

153. Plaintiff St. Joan of Arc Roman Catholic Church Society of Perrysburg, N.Y., now known as St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

154. Plaintiff St. John Baptist Roman Catholic Church Society of Carrollton, Vandalia, now known as St. Bonaventure's Roman Catholic Church Society of Allegany, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

155. Plaintiff St. John Baptist's Rom. Cath. Church Society of Boston, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

156. Plaintiff St. John Bosco Roman Catholic Church Society of Sheridan, N.Y., now known as Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

157. Plaintiff St. John Cantius R.C. Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

158. Plaintiff St. John De La Salle Roman Catholic Church of LaSalle, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

159. Plaintiff St. John Fisher Roman Catholic Church Society of South Dayton, N.Y., now known as St. Joseph's Roman Catholic Church Society of Gowanda, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

160. Plaintiff St. John Kanty Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

161. Plaintiff St. John Maron Roman Catholic Church Society of Buffalo, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

162. Plaintiff St. John of the Cross, Whitesville is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

163. Plaintiff St. John the Baptist R.C. Church Society of Alden Center, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

164. Plaintiff St. John the Baptist Roman Catholic Church Society of Carrollton, now known as St. Bonaventure's Roman Catholic Church Society of Allegany, is a not-for-profit

religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

165. Plaintiff St. John the Baptist Roman Catholic Church, Kenmore, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

166. Plaintiff St. John the Baptist's Roman Catholic Church Society of N. Collins, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

167. Plaintiff St. John the Evangelist Roman Catholic Church Society of Sinclairville, N.Y., now known as Saint Anthony's Roman Catholic Church Society of Fredonia, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

168. Plaintiff St. John Vianney Roman Catholic Church Society of Orchard Park, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

169. Plaintiff St. John's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

170. Plaintiff St. John's Roman Catholic Church Society of Jamestown, now known as Holy Apostles Roman Catholic Parish of Jamestown, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

171. Plaintiff St. John's Roman Catholic Church Society of Olean, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

172. Plaintiff St. Josephat's Roman Catholic Church of Cheektowaga, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

173. Plaintiff St. Joseph New Cathedral, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

174. Plaintiff St. Joseph Roman Catholic Church Society of Albion, New York, now known as Holy Family Roman Catholic Parish of Albion, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

175. Plaintiff St. Joseph Roman Catholic Church Society of Lyndonville, N.Y., now known as Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

176. Plaintiff St. Joseph's Cath. Church of Holland is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

177. Plaintiff St. Joseph's R.C. Church is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.



178. Plaintiff St. Joseph's Rom. Cath. Church Society of Batavia, N.Y., now known as Resurrection Roman Catholic Parish of Batavia, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

179. Plaintiff St. Joseph's Roman Catholic Church Society of Bliss, N.Y., now known as Saint Isidore Roman Catholic Parish of Perry, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

180. Plaintiff St. Joseph's Roman Catholic Society of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

181. Plaintiff St. Joseph's Roman Catholic Church of Fredonia, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

182. Plaintiff St. Joseph's Roman Catholic Church Society of Gowanda, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

183. Plaintiff St. Joseph's Roman Catholic Church Society of Leroy, New York, now known as Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

184. Plaintiff St. Joseph's Roman Catholic Church Society of Lockport, N.Y., now known as All Saints Roman Catholic Parish of Lockport, New York, is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

185. Plaintiff St. Joseph's Roman Catholic Church of Niagara Falls, N.Y., now known as Holy Family of Jesus, Mary, and Joseph Roman Catholic Church of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

186. Plaintiff St. Joseph's Roman Catholic Church Society of North Tonawanda, New York, now known as Our Lady of Czestochowa Roman Catholic Church Society of North Tonawanda, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

187. Plaintiff St. Joseph's Roman Catholic Church Society of Perry (Wyom. Co. NY), now known as Saint Isidore Roman Catholic Parish of Perry, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

188. Plaintiff St. Jude's Roman Catholic Church Society of Sardinia, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

189. Plaintiff St. Joseph's Roman Catholic Church Society of Scio, N.Y., now known as Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

190. Plaintiff St. Joseph's Roman Catholic Church Society of Varysburg, New York, now known as SS. Joachim & Anne Roman Catholic Church of Attica, New York, is a not-for-

profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

191. Plaintiff St. Lawrence's Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

192. Plaintiff St. Leo's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

193. Plaintiff St. Leo the Great Roman Catholic Church, Amherst, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

194. Plaintiff St. Leo's Roman Catholic Church Society of Niagara Falls, N.Y., now known as St. Vincent de Paul Roman Catholic Parish of Niagara Falls, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

195. Plaintiff St. Leo's Roman Catholic Society of Eggertsville, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

196. Plaintiff St. Louis Roman Catholic Church of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

197. Plaintiff St. Lucy's Roman Catholic Church is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

198. Plaintiff St. Luke R.C. Church Society of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

199. Plaintiff St. Margaret's Roman Catholic Church Society of Buffalo, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

200. Plaintiff St. Mark's Roman Catholic Church Society of Buffalo, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

201. Plaintiff St. Mark's Roman Catholic Church Society of Rushford, N.Y., now known as St. Patrick's Roman Catholic Church Society of Belfast, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

202. Plaintiff St. Martin's Church Society Langford Erie County, now known as Epiphany of Our Lord Roman Catholic Parish Community, Langford, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

203. Plaintiff St. Mary Magdalene Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

204. Plaintiff St. Mary of Immaculate Conception RCC Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

205. Plaintiff St. Mary of Lourdes Roman Catholic Church Society of Chautauqua, Bemus Point is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

206. Plaintiff St. Mary Redemptorist, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

207. Plaintiff St. Mary's Catholic Church Society of East Eden, now known as St. John Baptist's Rom. Cath. Church Society of Boston, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

208. Plaintiff St. Mary's Catholic Church Society of Pavilion, N.Y., now known as Mary Immaculate Roman Catholic Parish of Pavilion, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

209. Plaintiff St. Mary's Church of the Redemptorists of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

210. Plaintiff St. Mary's of the Lake Roman Catholic Church Society of Mount Vernon, Hamburg is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

211. Plaintiff St. Mary's Roman Church Society, now known as The St. John the Baptist Roman Cath Congregation, is a not-for-profit religious corporation duly organized and

existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

212. Plaintiff St. Mary's Roman Catholic Church Society of Batavia, N.Y., now known as Resurrection Roman Catholic Parish of Batavia, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

213. Plaintiff St. Mary's Roman Catholic Church Society of Belmont, N.Y., now known as Holy Family of Jesus, Mary, and Joseph Roman Catholic Church Society of Belmont, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

214. Plaintiff St. Mary's Roman Catholic Church Society of Bolivar, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

215. Plaintiff St. Mary's Roman Catholic Church Society of Canaseraga, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

216. Plaintiff St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

217. Plaintiff St. Mary's Roman Catholic Church Society of Holley is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

218. Plaintiff St. Mary's Roman Catholic Church Society of Little Valley, N.Y., now known as St. Mary's Roman Catholic Church Society of Cattaraugus, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

219. Plaintiff St. Mary's Roman Catholic Church Society of Mayville, N.Y., now known as St. Mary of Lourdes Roman Catholic Church Society of Chautauqua, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

220. Plaintiff St. Mary's Roman Catholic Church Society of Medina, N.Y., now known as Holy Trinity Roman Catholic Church of Medina, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

221. Plaintiff St. Mary's Roman Catholic Church Society of Niagara Falls, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

222. Plaintiff St. Mary's Roman Catholic Church Society of Strykersville, now known as St. John Neumann Roman Catholic Church of Wyoming County, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

223. Plaintiff St. Mary's Roman Catholic Church Society of Swormville is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

224. Plaintiff St. Mary's Roman Catholic Church Society Silver Springs N.Y., now known as Saint Isidore Roman Catholic Parish of Perry, New York, is a not-for-profit religious

corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

225. Plaintiff St. Matthew's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

226. Plaintiff St. Michael Archangel Roman Catholic Church Society of Lackawanna, now known as Queen of Angels R.C. Church of Lackawanna, NY, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

227. Plaintiff St. Michael's Roman Catholic Church Society of Buffalo, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

228. Plaintiff St. Michael's Roman Catholic Church Society of Warsaw, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

229. Plaintiff St. Michael's Roman Catholic Church Society of South Byron, now known as St. Brigid's Roman Catholic Church Society of Bergen, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

**230.** Plaintiff St. Monica's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

231. Plaintiff St. Nicholas Roman Catholic Congregation of North Java N.Y., now known as St. John Neumann Roman Catholic Church of Wyoming County, is a not-for-profit



religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

232. Plaintiff St. Pacificus Church & Cemetery Association of Humphrey, now known as The Holy Name of Mary Roman Catholic Church Society of Ellicottville, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

233. Plaintiff St. Patrick's Roman Catholic Church of Belfast, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

234. Plaintiff St. Patrick Roman Catholic Church Society of Hartland, now known as Our Lady of the Lake Roman Catholic Parish of Barker and Lyndonville, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

235. Plaintiff St. Patrick's Roman Catholic Church Society of the City of Lockport, N.Y., now known as All Saints Roman Catholic Parish of Lockport, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

236. Plaintiff St. Patrick's Roman Catholic Church Society of Limestone, N.Y., now known as Our Lady of Peace Salamanca, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

237. Plaintiff St. Patrick's Roman Catholic Church Society of Randolph, N. Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

238. Plaintiff St. Patrick's Roman Catholic Church Society of Salamanca, N.Y., now known as Our Lady of Peace Roman Catholic Parish of Salamanca, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

239. Plaintiff St. Paul's Roman Catholic Church Society of Dayton, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

240. Plaintiff St. Paul's Roman Catholic Church Society of Kenmore is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

241. Plaintiff St. Peter's Roman Catholic Church Society of Leroy, now known as Our Lady of Mercy Roman Catholic Parish of LeRoy, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

242. Plaintiff St. Peter's Roman Catholic Church Society of Lewiston, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

243. Plaintiff St. Philomena's Roman Catholic Church Society of Franklinville, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

244. Plaintiff St. Pius X Roman Catholic Church Society of Town of Amherst, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

245. Plaintiff SS. Rita and Patrick Roman Catholic Church Society of Buffalo, N.Y., now known as St. Clare Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

246. Plaintiff St. Rose of Lima Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

247. Plaintiff St. Rose of Lima Roman Catholic Church of Forestville, now known as Our Lady of Mount Carmel Roman Catholic Church Society of Silver Creek, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

248. Plaintiff St. Stanislaus Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

249. Plaintiff St. Stanislaus Kostka's Roman Catholic Church Society of Niagara Falls, N.Y., now known as Divine Mercy Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

250. Plaintiff St. Stanislaus Kostka's Roman Catholic Church Society of Perry, N.Y., now known as Saint Isidore Roman Catholic Parish of Perry, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

251. Plaintiff St. Stephen's Rom. Cath. Church Society of Buffalo, now known as St. Clare Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation

duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

252. Plaintiff St. Stephen's Roman Catholic Church of Grand Island, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

253. Plaintiff St. Stephen's Roman Catholic Church Society, now known as Holy Trinity Roman Catholic Church of Medina, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

254. Plaintiff St. Teresa of Avila Roman Catholic Church of Akron, NY is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

255. Plaintiff St. Teresa of the Infant Jesus Roman Catholic Church of Niagara Falls, now known as St. Raphael's Roman Catholic Parish of Niagara Falls, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

256. Plaintiff St. Teresa's Roman Catholic Church Society is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

257. Plaintiff St. Thomas Aquinas Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

258. Plaintiff St. Thomas More, Ripley is a religious organization located in the State of New York and is now known as St. Dominic Roman Catholic Church of Chautauqua County,

a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

259. Plaintiff St. Timothy's Roman Catholic Church Society of Tonawanda, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

260. Plaintiff St. Valentine's Roman Catholic Church Society of Buffalo, now known as St. Clare Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

261. Plaintiff St. Vincent de Paul Roman Catholic Church Society of Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

262. Plaintiff St. Vincent's Roman Catholic Church Society of Attica, N.Y., now known as SS. Joachim & Anne Roman Catholic Church of Attica, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

263. Plaintiff St. Vincent's Roman Catholic Church Society of North Evans, now known as Saint John Paul II Roman Catholic Parish Community, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

264. Plaintiff St. Vincents Roman Catholic Church of Springbrook, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

265. Plaintiff Sts. Agatha and Ambrose Roman Catholic Parish of Buffalo, N.Y., now known as Our Lady of Charity Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

266. Plaintiff Sts. Peter and Paul R. C. Church Society Arcade, New York, now known as St. Mary Roman Catholic Church Society of Arcade, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

267. Plaintiff The Annunciation Roman Catholic Church Society of Buffalo, N.Y., now known as Our Lady of Hope Roman Catholic Parish of Buffalo, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

268. Plaintiff The Ascension Roman Catholic Church Society of North Tonawanda, now known as Saint Jude the Apostle Roman Catholic Parish of North Tonawanda, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

269. Plaintiff The Assumption Roman Catholic Church Society of Albion, now known as Holy Family Roman Catholic Parish of Albion, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

270. Plaintiff The Assumption Roman Catholic Church Society of Portageville, N.Y., now known as Saint Isidore Roman Catholic Parish of Perry, New York, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

271. Plaintiff The Church of St. Mary of Angels, Olean is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

272. Plaintiff The Church of St. Mary of Sorrows, now known as Sts. Columba-Brigid Roman Catholic Church of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

273. Plaintiff The Church of the Assumption of Lancaster N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

274. Plaintiff The Good Shepherd Roman Catholic Church Society of Pendleton, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

275. Plaintiff The Holy Cross Roman Catholic Church Society of Salamanca, New York, now known as St. Patrick's Roman Catholic Church Society of Limestone, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

276. Plaintiff The Holy Family Roman Catholic Church Society of the City of Buffalo, now known as Our Lady of Charity Catholic Parish, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

277. Plaintiff The Holy Fourteen Helpers of the Town of West Seneca, Middle Ebenezer is a not-for-profit religious corporation duly organized and existing under and by virtue

of the laws of the State of New York, with its principal place of business located in the State of New York.

278. Plaintiff The Holy Name of Mary Roman Catholic Church Society of East Pembroke, N.Y., now known as Saint Maximilian Kolbe Roman Catholic Parish of Corfu, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

279. Plaintiff The Holy Name of Mary Roman Catholic Church Society of Ellicottville, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

280. Plaintiff The Immaculate Conception Roman Catholic Church Society of East Aurora, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

281. Plaintiff The Immaculate Conception Roman Catholic Church Society of Wellsville, N.Y. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

282. Plaintiff The Most Holy Redeemer Roman Catholic Church Society of Cheektowaga, N.Y., now known as St. Lawrence's Roman Catholic Church Society of Buffalo, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.



283. Plaintiff The Nativity Roman Catholic Church Society of Orchard Park, New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

284. Plaintiff The Queen of Peace Roman Catholic Church Society of Buffalo, now known as Saint John Gualbertus' Roman Catholic Church Society of Cheektowaga, Erie Co., N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

285. Plaintiff The Roman Catholic Church of St. Franciscus Xavarius, Buffalo, now known as Assumption Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

286. Plaintiff The Sacred Heart of Jesus Roman Catholic Church Society of Batavia, New York, now known as Ascension Roman Catholic Parish of Batavia, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

287. Plaintiff The Sacred Heart of Jesus Roman Catholic Church Society of Dunkirk New York is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

288. Plaintiff The St. John Baptist's Society North Buffalo, now known as Assumption Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly

organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

289. Plaintiff The St. John the Baptist Roman Cath Congregation is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

290. Plaintiff The Visitation Roman Catholic Church Society of Buffalo N.Y., now known as St. Katharine Drexel Roman Catholic Church Society of Buffalo, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

291. Plaintiff Transfiguration, Buffalo is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

292. Plaintiff Transfiguration Roman Catholic Church Society, now known as St. John's Roman Catholic Church Society of Olean, N.Y., is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

293. Plaintiff Trustees of St. Patrick Church, Town of Java, now known as St. John Neumann Roman Catholic Church of Wyoming County, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located in the State of New York.

294. Plaintiff the Diocese is a not-for-profit religious corporation, existing under the laws of the State of New York, with the episcopal see and principal place of business in Buffalo, New York. The Diocese was established on April 23, 1847 by Pope Pius IX and encompasses eight counties in western New York.

295. Upon information and belief, 21st Century Premier Insurance Company (“21st Century”), formerly known as National Ben Franklin Fire Insurance Co. of Pittsburgh, PA (“National Ben Franklin”), is a corporation organized under the laws of Pennsylvania, with its principal place of business in Wilmington, Delaware. Upon information and belief, 21st Century operates in the State of New York and was formerly known as National Ben Franklin, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

296. Upon information and belief, Ace Property and Casualty Insurance (“ACE”), as successor in interest to Aetna Insurance Company (“Aetna”), is a corporation organized under the laws of Pennsylvania with its principal place of business in Philadelphia. Upon information and belief, ACE operates in the State of New York and is the successor to Aetna, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

297. Upon information and belief, Home Fire and Marine Insurance Company of California (“Home Fire & Marine”), now doing business as Fireman’s Fund Corporation, is a corporation organized under the laws of California, with its principal place of business in California. Upon information and belief, Home Fire & Marine, d/b/a Fireman’s Fund Corporation, operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

298. Upon information and belief, American Alternative Insurance Corporation (“American Alternative”), as successor in interest to American Union Insurance Company of New York (“American Union”), is a corporation organized under the laws of Delaware with its principal place of business in Princeton, New Jersey. Upon information and belief, American

Alternative operates in the State of New York and is the successor to American Union, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

299. Upon information and belief, American Automobile Insurance Company (“American Automobile”) is a corporation organized under the laws of Missouri with its principal place of business in Chicago, Illinois. Upon information and belief, American Automobile operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

300. Upon information and belief, American Guarantee and Liability Insurance Company (“American Guarantee”) is a corporation organized under the laws of New York with its principal place of business in Schaumburg, Illinois. Upon information and belief, American Guarantee operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

301. Upon information and belief, American Insurance Company (“American”) is a corporation organized under the laws of Ohio with its principal place of business in Chicago, Illinois. Upon information and belief, American operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

302. Upon information and belief, Arrowood Indemnity Company (“Arrowood”) as successor in interest to American and Foreign Insurance Company (“American & Foreign”), Eagle Indemnity Company of New York (“Eagle Indemnity”), Globe Indemnity Company (“Globe Indemnity”), Phoenix Assurance Company of New York (“Phoenix”), New Amsterdam

Casualty Company (“New Amsterdam”), and Safeguard Insurance Company (“Safeguard”), is a corporation organized under the laws of Delaware, with its principal place of business in Charlotte, North Carolina. Upon information and belief, Arrowood, formerly known as Royal Indemnity Company, operates in the State of New York and is the successor to American & Foreign, Eagle Indemnity, Globe Indemnity, Phoenix, New Amsterdam, and Safeguard, each of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

303. Upon information and belief, Bedivere Insurance Company (“Bedivere”), formerly known as Potomac Insurance Company (“Potomac”), is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, Bedivere operates in the State of New York and was formerly known as Potomac, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse. Upon information and belief, Bedivere is also the successor in interest to OneBeacon Insurance Company, which is the successor in interest to General Accident Insurance Company of America formerly known as the United States Branch of General Accident Fire and Life Assurance Corporation plc, one or more of which sold insurance policies and/or certificates to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

304. Upon information and belief, Century Indemnity Company (“Century”) is a corporation organized under the laws of Pennsylvania, with a principle place of business in Philadelphia, Pennsylvania. Upon information and belief, Century operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

305. Upon information and belief, Certain Underwriters at Lloyd's, London and Certain London Market Companies that subscribed to certain policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse are domiciled in the United Kingdom.

306. Upon information and belief, Columbia Casualty Company ("Columbia Casualty") is a corporation organized under the laws of Illinois, with its principal place of business in Chicago, Illinois. Upon information and belief, Columbia Casualty operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

307. Upon information and belief, Continental Casualty Company ("Continental Casualty") is a corporation organized under the laws of Illinois, with its principal place of business in Chicago, Illinois. Upon information and belief, Continental Casualty operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

308. Upon information and belief, The Continental Insurance Company ("Continental") is a corporation organized under the laws of Pennsylvania, with its principal place of business in Chicago, Illinois. Upon information and belief Continental operates in the State of New York and is the successor to Commercial Insurance Company of Newark, New Jersey, formerly known as Commercial Casualty Insurance Company, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse. Upon information and belief, Continental is also the successor in interest to Boston Old Colony Insurance Company, Fidelity and Casualty Company of New York, Glens Falls Insurance Company formerly known as Fidelity-Phenix Insurance Company, London Guarantee and Accident Company, Limited, Firemen's Insurance

Company of Newark, New Jersey, and Niagara Fire Insurance Company, each of which sold insurance policies and/or certificates to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

309. Upon information and belief, Covenant Insurance Company (“Covenant”), as the successor in interest of Covenant Mutual Insurance Company (“Covenant Mutual”), is a corporation organized under the laws of Connecticut, with its principal place of business in Southbury, Connecticut. Upon information and belief, Covenant operates in the State of New York and was formerly known as Hartford County Mutual Fire Insurance Company and Mutual Insurance Company of Hartford, one or more of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

310. Upon information and belief, the Employers’ Fire Insurance Company (“Employers’ Fire”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, Employers’ Fire operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

311. Upon information and belief, Employers Insurance Company of Wausau (“Employers Wausau”) is a corporation organized under the laws of Wisconsin, with its principal place of business in Boston, Massachusetts. Upon information and belief, Employers Wausau operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse. Upon information and belief, Employers Wausau was formerly known as Employers Insurance of Wausau A Mutual Company, which was formerly known as Employers

Mutual Liability Insurance Company of Wisconsin, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

312. Upon information and belief, Excelsior Insurance Company (“Excelsior”) is a corporation organized under the laws of New Hampshire, with its principal place of business in Boston, Massachusetts. Upon information and belief, Excelsior operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

313. Upon information and belief, Fair American Insurance and Reinsurance Company (“Fair American”), formerly known as Putnam Reinsurance Company (“Putnam Re”), is a corporation organized under the laws of New York, with its principal place of business in New York, New York. Upon information and belief, Fair American operates in the State of New York and was formerly known as Putnam Re, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

314. Upon information and belief, Federal Insurance Company (“Federal”) is a corporation organized under the laws of Indiana with its principal place of business in Whitehouse Station, New Jersey. Upon information and belief, Federal operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

315. Upon information and belief, Fireman’s Fund Insurance Company (“Fireman’s Fund”) is a corporation organized under the laws of California with its principal place of business in Chicago, Illinois. Upon information and belief, Fireman’s Fund operates in the State



of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

316. Upon information and belief, Great American Insurance Company (“Great American”), as successor in interest to Agricultural Insurance Company (“Agricultural”), is a corporation organized under the laws of Ohio, with its principal place of business in Cincinnati, Ohio. Upon information and belief, Great American operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse. Upon information and belief, Great American is also the successor to Agricultural, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

317. Upon information and belief, Great American Insurance Company of New York (“Great American New York”), as successor in interest to American National Fire Insurance Company (“American National”), is a corporation organized under the laws of New York with its principal place of business in Cincinnati, Ohio. Upon information and belief, Great American New York operates in the State of New York and is the successor to American National, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

318. Upon information and belief, Guarantee Mutual Assurance Co. of America (“Guarantee Mutual”) is a corporation organized under the laws of Massachusetts, with its principal place of business in Worcester, Massachusetts. Upon information and belief, Guarantee Mutual sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

319. Upon information and belief, Hanover Insurance Company (“Hanover”) is a corporation organized under the laws of New Hampshire with its principal place of business in Worcester, Massachusetts. Upon information and belief, Hanover operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse. Upon information and belief, Hanover is also the successor in interest to Massachusetts Bonding and Insurance Company, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

320. Upon information and belief, Harford Mutual Insurance Company (“Harford Mutual”) is a corporation organized under the laws of Maryland with its principal place of business in Bel Air, Maryland. Upon information and belief, Harford Mutual operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

321. Upon information and belief, Hartford Steam Boiler Inspection and Insurance Company (“Hartford Steam”) is a corporation organized under the laws of Connecticut with its principal place of business in Hartford, Connecticut. Upon information and belief, Hartford Steam operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

322. Upon information and belief, Indemnity Insurance Company of North America (“IINA”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, IINA operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

323. Upon information and belief, Insurance Company of North America (“INA”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, INA operates in the state of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

324. Upon information and belief, Integon National Insurance Company (“Integon”), formerly known as Bankers and Shippers Insurance Company (“Bankers & Shippers”), is a corporation organized under the laws of North Carolina with its principal place of business in Winston-Salem, North Carolina. Upon information and belief, Integon operates in the State of New York and was formerly known as Bankers & Shippers, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

325. Upon information and belief, Lamorak Insurance Company (“Lamorak”), formerly known as Commercial Union Insurance Company (“Commercial Union”), which was formerly known as Employers Commercial Union Insurance Company (“Employers Commercial Union”), is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, Lamorak operates in the State of New York and was formerly known as OneBeacon America Insurance Company, which was formerly known as Commercial Union, which was formerly known as Employers Commercial Union, one or more of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

326. Upon information and belief, Liberty Mutual Insurance Company is a corporation organized under the laws of Massachusetts, with its principal place of business in Boston,

Massachusetts. Upon information and belief, Liberty Mutual operates in the state of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

327. Upon information and belief, Merchants Mutual Insurance Company (“Merchants”) is a corporation organized under the laws of New York, with its principal place of business in Buffalo, New York. Upon information and belief, Merchants operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

328. Upon information and belief, Metropolitan Casualty Insurance Company (“Metropolitan Casualty”) is a corporation organized under the laws of Rhode Island, with its principal place of business in Warwick, Rhode Island. Upon information and belief, Metropolitan Casualty operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

329. Upon information and belief, Michigan Millers Mutual Insurance Company (“Michigan Millers”) is a corporation organized under the laws of Michigan with its principal place of business in Lansing, Michigan. Upon information and belief, Michigan Millers operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

330. Upon information and belief, Middlesex Insurance Company (“Middlesex”), formerly known as Middlesex Mutual Insurance Company (“Middlesex Mutual”), is a corporation organized under the laws of Wisconsin, with its principal place of business in Stevens Point, Wisconsin. Upon information and belief, Middlesex operates in the State of New York and was formerly known as Middlesex Mutual, which sold insurance policies and/or

certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

331. Upon information and belief, National Surety Corporation (“National Surety”) is a corporation organized under the laws of Illinois, with its principal place of business in Chicago, Illinois. Upon information and belief, National Surety operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

332. Upon information and belief, National Union Fire Insurance Company of Pittsburgh, PA (“National Union”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Harrisburg, Pennsylvania. Upon information and belief, National Union operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

333. Upon information and belief, Nationwide Insurance Company of America (“Nationwide”) is a corporation organized under the laws of Wisconsin, with its principal place of business in Columbus, Ohio. Upon information and belief, Nationwide operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

334. Upon information and belief, Nationwide Mutual Insurance Company (“Nationwide”) is a corporation organized under the laws of Ohio, with its principal place of business in Columbus, Ohio. Upon information and belief, Nationwide operates in the State of New York and was formerly known as Farm Bureau Mutual Automobile Insurance Company, which sold insurance policies providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

335. Upon information and belief, New England Insurance Company (“New England”), formerly known as New England Reinsurance Corporation (“New England Re”), is a corporation organized under the laws of Massachusetts, with its principal place of business in Boston, Massachusetts. Upon information and belief, New England and/or New England Re sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

336. Upon information and belief, New Hampshire Insurance Company (“New Hampshire”) is a corporation organized under the laws of Illinois, with its principal place of business in New York, New York. Upon information and belief, New Hampshire operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

337. Upon information and belief, Harleysville Insurance Company of New York (“Harleysville”), as successor in interest to New York Casualty Insurance Company (“New York Casualty”), is a corporation organized under the laws of Ohio, with its principle place of business in Harleysville, Pennsylvania. Upon information and belief, Harleysville operates in the State of New York, and was formerly known as Mainland Insurance Company, which is successor to New York Casualty, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

338. Upon information and belief, New York Central Mutual Fire Insurance Company (“New York Central”) is a corporation organized under the laws of New York, with its principal place of business in Edmeston, New York. Upon information and belief, New York Central operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

339. Upon information and belief, NGM Insurance Company (“NGM”), as successor in interest to National Grange Mutual Insurance Company (“National Grange”), is a corporation organized under the laws of Florida, with its principal place of business in Jacksonville, Florida. Upon information and belief, NGM operates in the State of New York and is the successor to National Grange, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

340. Upon information and belief, North River Insurance Company (“North River”) is a corporation organized under the laws of New Jersey, with its principal place of business in Morristown, New Jersey. Upon information and belief, North River operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

341. Upon information and belief, Pawtucket Insurance Company (“Pawtucket”) is a corporation organized under the laws of Rhode Island, with its principal place of business in Johnston, Rhode Island. Upon information and belief, Pawtucket sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

342. Upon information and belief, Peerless Insurance Company (“Peerless”) is a corporation organized under the laws of New Hampshire, with its principal place of business in Boston, Massachusetts. Upon information and belief, Peerless operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

343. Upon information and belief, Pennsylvania Lumbermens Mutual Insurance Company (“Pennsylvania Lumbermens”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon

information and belief, Pennsylvania Lumbermens operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

344. Upon information and belief, Phoenix & London Assurance Limited (“Phoenix & London”) is a corporation organized under the laws of United Kingdom, with its principal place of business in Birmingham, United Kingdom. Upon information and belief, Phoenix & London sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

345. Upon information and belief, Phoenix Insurance Company (“Phoenix”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, Phoenix operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

346. Upon information and belief, Providence Washington Insurance Company (“Providence”) is a corporation organized under the laws of Rhode Island, with its principal place of business in Warwick, Rhode Island. Upon information and belief, Providence operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

347. Upon information and belief, Royal Globe Insurance Company (“Royal Globe”) is a corporation organized under the laws of Illinois, with its principal place of business in Chicago, Illinois. Upon information and belief, Royal Globe sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.



348. Upon information and belief, RSUI Indemnity Company (“RSUI”), as successor in interest to Buffalo Insurance Company (“Buffalo”), is a corporation organized under the laws of New Hampshire, with its principle place of business in Atlanta, Georgia. Upon information and belief, RSUI operates in the State of New York and was formerly known as Underwriters Reinsurance Company, which was formerly known as Buffalo Reinsurance Company, which was formerly known as Buffalo, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during the underlying claimants allege abuse.

349. Upon information and belief, Selective Insurance Company of America (“Selective”) is a corporation organized under the laws of New Jersey, with its principal place of business in Branchville, New Jersey. Upon information and belief, Selective operates in the State of New York and was formerly known as Exchange Mutual Insurance Company, which was formerly known as Exchange Mutual Indemnity Insurance Company, one or more of which sold insurance policies providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

350. Upon information and belief, SPARTA Insurance Company (“SPARTA”), as successor in interest to American Employers’ Insurance Company (“American Employers”), is a corporation organized under the laws of Connecticut with its principal place of business in Farmington, Connecticut. Upon information and belief, SPARTA operates in the State of New York and is the successor to American Employers, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

351. Upon information and belief, St. Paul Fire and Marine Insurance Company (“St. Paul F&M”) is a corporation organized under the laws of Connecticut, with its principal place of

business in Hartford, Connecticut. Upon information and belief, St. Paul F&M operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

352. Upon information and belief, St. Paul Mercury Insurance Company (“St. Paul Mercury”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, St. Paul Mercury operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

353. Upon information and belief, The Hartford Financial Services Group (“The Hartford”) as successor in interest to Hartford Accident and Indemnity Company (“Hartford Accident”) and Hartford Fire Insurance Company (“Hartford Fire”), is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, The Hartford, acting through itself or through a subsidiary, operates in the State of New York and is the successor to Hartford Accident and Hartford Fire, one or more of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

354. Upon information and belief, TIG Insurance Company (“TIG”), as successor in interest to American Surety Company of New York (“American Surety”) and Manufacturers Casualty Insurance Company (“Manufacturers Casualty”), is a corporation organized under the laws of California with its principal place of business in Manchester, New Hampshire. Upon information and belief, TIG operates in the State of New York and is the successor to American Surety and Manufacturers Casualty, each of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

355. Upon information and belief, Travelers Casualty and Surety Company (“Travelers Casualty”), as successor in interest to Aetna Casualty and Surety Company (“Aetna Casualty”) is a corporation organized under the laws of Connecticut with its principal place of business in Hartford, Connecticut. Upon information and belief, Travelers Casualty operates in the State of New York and was formerly known as Aetna Casualty, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

356. Upon information and belief, Traveler’s Indemnity Company (“Travelers”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, Travelers operates in the State of New York and is the successor to Gulf Insurance Company, each of which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

357. Upon information and belief, U.S. Fidelity and Guaranty Company (“U.S. Fidelity”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, U.S. Fidelity operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

358. Upon information and belief, U.S. Fire Insurance Company (“U.S. Fire”) is a corporation organized under the laws of Delaware, with its principal place of business in Morristown, New Jersey. Upon information and belief, U.S. Fire operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

359. Upon information and belief, Unigard Insurance Company (“Unigard”), as successor in interest to Jamestown Mutual Insurance Company (“Jamestown”), is a corporation organized under the laws of Wisconsin, with its principal place of business in Sun Prairie, Wisconsin. Upon information and belief, Unigard operates in the State of New York and is the successor to Jamestown, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

360. Upon information and belief, Utica Mutual Insurance Company (“Utica”) is a corporation organized under the laws of New York, with its principal place of business in Utica, New York. Upon information and belief, Utica operates in the State of New York and sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

361. Upon information and belief, Westport Insurance Corporation (“Westport”), as successor in interest to the Manhattan Fire and Marine Insurance Company (“Manhattan F&M”), is a corporation organized under the laws of Missouri, with its principal place of business in Kansas City, Missouri. Upon information and belief, Westport operates in the State of New York and is the successor to Manhattan F&M, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

362. Upon information and belief, the Yorkshire Insurance Company of New York (“Yorkshire Insurance”), formerly known as The Yorkshire Indemnity Company of New York (“Yorkshire Indemnity”), is a corporation organized under the laws of New York, with its principal place of business in New York, New York. Upon information and belief, Yorkshire Insurance operates in the State of New York and was formerly known as Yorkshire Indemnity,

which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

363. Upon information and belief, Zurich American Insurance Company (“Zurich”), as successor in interest to Maryland Casualty Company (“Maryland”), is a corporation organized under the laws of New York, with its principal place of business in Schaumburg, Illinois. Upon information and belief, Zurich operates in the State of New York and is the successor to Maryland or one or more other insurance companies operating under the Zurich Insurance Group, which sold insurance policies and/or certificates providing coverage to one or more Parishes for certain time frames during which the underlying claimants allege abuse.

#### **JURISDICTION AND VENUE**

364. On or about February 28, 2020, the Diocese filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*

365. Pursuant to §§ 1107 and 1108 of the Bankruptcy Code, the Diocese continues to operate and manage its property as a debtor-in-possession.

366. This Court has personal jurisdiction over each Defendant because each Defendant has sufficient contacts with the State of New York. Further, each otherwise availed itself of the markets of New York.

367. This Court has subject matter jurisdiction as this adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157 insofar as it seeks to determine the extent and nature of the interests of the bankruptcy estate in certain policies and/or certificates and rights under said policies and/or certificates of insurance, under 11 U.S.C. § 541.

368. Alternatively, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §1334(b) because this is an action arising in or related to the Diocese’s bankruptcy proceeding, which is a case under Title 11 of the United States Code.

369. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(a) and 1391(b) because a substantial part of the events or omissions giving rise to the dispute occurred in this District, including the issuance of the respective insurance policies and/or certificates at issue.

### **THE INSURANCE POLICIES**

370. The Parishes are within the Diocese. Upon information and belief, at various times from at least 1950 to approximately 1973, in consideration of premiums paid by the Parishes, the Diocese or the Diocesan corporations, the Insurers, among others, sold or acquired responsibility for primary general liability insurance policies and/or certificates, as well as certain umbrella and/or excess liability policies and/or certificates, sold to the Parishes (the “Insurance Policies”).

371. The Insurance Policies provide coverage for individual Parishes. Upon information and belief, some or all the Insurance Policies also provide coverage for the Diocese as an additional insured.

372. Upon information and belief, each of the Insurance Policies requires the Insurers to pay on behalf of the insured(s) all sums that the insured(s) become legally obligated to pay as a result of bodily injury, as long as any part of the injury took place, and with regard to certain Insurance Policies a claim was made, during the policy period.

373. Upon information and belief, each of the Insurance Policies also requires the Insurers to pay defense costs and expenses, including attorney’s fees, incurred by the insured(s) in the investigation and defense of the Underlying Actions and Claims. This obligation applies even if the allegations against the insured(s) are groundless, false, or fraudulent.

374. Upon information and belief, the Parishes, the Diocese, and/or Diocesan corporations, timely paid all premiums due under the Insurance Policies.

## THE UNDERLYING ACTIONS

375. The Underlying Actions and Claims contain allegations against the Parishes and/or the Diocese. The claimants in the Underlying Actions and Claims allege that the Parishes and/or the Diocese were negligent and the claimants suffered injuries resulting from alleged sexual abuse.

376. The Parishes and/or Diocese have fulfilled all of their duties and conditions under each of the Insurance Policies, including timely notifying Defendants of Underlying Actions and Claims and at all times cooperating with the Insurers' reasonable requests.

377. The Parishes and/or Diocese are entitled to all benefits provided by the Insurance Policies.

378. The Underlying Actions and Claims are covered by the Insurance Policies.

379. The Insurers have failed to acknowledge their full coverage obligations to (a) defend or pay for the defense of the Parishes and/or Diocese and/or (b) indemnify the Parishes and/or Diocese, including the funding of any past and future settlements or judgments, in connection with the Underlying Actions and Claims, despite the Parishes' timely request that they do so.

380. By failing to acknowledge their full coverage obligations to defend and/or indemnify the Parishes and/or Diocese in connection with some or all of the Underlying Actions and Claims, the Insurers have breached their contractual obligations to the Parishes. Consequently, an actual and justiciable claim exists as to all Insurers named as Defendants in this action.

## COUNT I

### **Declaratory Judgment Against All Insurers – Duty to Defend**

381. The Parishes and Diocese repeat and reallege each and every allegation contained in paragraphs 1 through 380 above with the same force and effect as though fully set forth herein.

382. The Parishes and Diocese seek a judicial determination of the rights and duties of the Parishes and the Insurers with respect to an actual controversy arising out of the Insurance Policies.

383. Pursuant to the terms of the Insurance Policies, each of the Insurers is obligated to pay in full the expenditures made by Parishes and/or the Diocese to defend themselves against the Underlying Actions and Claims.

384. The Insurers have refused or failed or may refuse or fail to accept their legal obligations to pay in full for the Parishes' and the Diocese's defense of some or all of the Underlying Actions and Claims.

385. The Insurers' refusal or failure to defend the Parishes and/or the Diocese constitutes a breach of the Policies.

386. An actual controversy of a justiciable nature presently exists between the Parishes and/or Diocese, and the Insurers concerning the proper construction of the Insurance Policies and the rights and obligations of the parties thereto with respect to the Parishes' and/or the Diocese's defense costs attributable to some or all of the Underlying Actions and Claims. The controversy is of sufficient immediacy and magnitude to justify the issuance of a declaratory judgment.

387. The issuance of declaratory relief by this Court will terminate some or all of the existing controversy between the parties.



## COUNT II

### **Breach of Contract Against All Insurers Seeking Damages – Duty to Defend**

388. The Parishes and Diocese repeat and reallege each and every allegation contained in paragraphs 1 through 387 above with the same force and effect as though fully set forth herein.

389. The Parishes and Diocese have incurred and may continue to incur substantial damages in the form of costs to defend themselves against the Underlying Actions and Claims for which each of the Insurers is responsible pursuant to the terms of the Insurance Policies.

390. The Insurance Policies are valid and enforceable contracts providing insurance coverage for the damages incurred by the Parishes and/or the Diocese.

391. The Parishes and/or Diocese have given timely notice of the Underlying Actions and Claims.

392. The Parishes and/or Diocese substantially performed all material obligations on their part to be performed under the Insurance Policies.

393. Each of the Insurers that received notice of the Underlying Actions and Claims has refused to accept its legal obligations to pay the Parishes' and/or the Diocese's defense costs in response to some or all of the Underlying Actions and Claims.

394. Each of the Insurers' failure to defend the Parishes and/or the Diocese constitutes a breach of the Insurance Policies.

395. As a direct and proximate result of each of the Insurers' breach of the Insurance Policies, the Parishes and/or the Diocese are suffering and will continue to suffer damages equal to the sums they would be entitled to recover as benefits under the Insurance Policies.

### COUNT III

#### **Declaratory Judgment Against All Insurers – Duty to Indemnify**

396. The Parishes and the Diocese repeat and reallege each and every allegation contained in paragraphs 1 through 395 above with the same force and effect as though fully set forth herein.

397. The Parishes and the Diocese seek a judicial determination of the rights and duties of the Parishes and/or the Diocese, and the Insurers with respect to an actual controversy arising out of the Insurance Policies.

398. Pursuant to the terms of the Insurance Policies, each of the Insurers is obligated to indemnify the Parishes and/or the Diocese for, or pay on their behalf, all sums that the Parishes and/or Diocese become obligated to pay, through judgment, settlement, or otherwise, arising out of the Underlying Actions and Claims.

399. The Insurers have refused or failed or may refuse or fail to accept their legal obligations to indemnify the Parishes and/or the Diocese for the total sums that the Parishes and/or the Diocese are legally obligated to pay as a result of some or all of the Underlying Actions and Claims.

400. Each of the Insurers' refusal or failure to indemnify the Parishes and/or the Diocese constitutes a breach of the Policies.

401. An actual controversy of a justiciable nature presently exists between the Parishes and the Diocese and the Insurers concerning the proper construction of the Insurance Policies and the rights and obligations of the parties thereto with respect to the Underlying Actions and Claims. The controversy is of sufficient immediacy and magnitude to justify the issuance of a declaratory judgment.

402. The issuance of declaratory relief by this Court will terminate some or all of the existing controversy between the parties.

#### COUNT IV

##### **Breach of Contract Against All Insurers Seeking Damages – Duty to Indemnify**

403. The Parishes and the Diocese repeat and reallege each and every allegation contained in paragraphs 1 through 402 above with the same force and effect as though fully set forth herein.

404. The Parishes and/or the Diocese incurred damages in the form of costs to pay settlements and/or judgments in the Underlying Actions and Claims for which each of the Insurers is responsible pursuant to the terms of the Insurance Policies.

405. The Policies are valid and enforceable contracts providing insurance coverage for the damages incurred by the Parishes and/or the Diocese.

406. The Parishes and/or the Diocese have given timely notice of the Underlying Actions and Claims.

407. The Parishes and/or the Diocese substantially performed all material obligations on their part to be performed under the Insurance Policies.

408. Each of the Insurers that received notice of the Underlying Actions and Claims has refused to accept its legal obligations to provide coverage for the Parishes and/or the Diocese in response to some or all of the Underlying Actions and Claims.

409. Each of the Insurers' failure to indemnify the Parishes and/or the Diocese constitutes a breach of the Insurance Policies.

410. As a direct and proximate result of each of the Insurers' breach of the Insurance Policies, the Parishes and/or the Diocese are suffering and will continue to suffer damages equal to the sums they would be entitled to recover as benefits under the Insurance Policies.

## **PRAYER FOR RELIEF**

**WHEREFORE**, the Parishes pray for judgment as follows:

1. On Count I, the Parishes and the Diocese request that this Court enter a declaratory judgment in favor of the Parishes and the Diocese against each of the Insurers, declaring that each of the Insurers is severally and indivisibly obligated to pay the costs of defending the Parishes and, to the extent covered as an additional insured, the Diocese, against the Underlying Actions and Claims, together with attorneys' fees and costs and pre-judgment interest;

2. On Count II, the Parishes and the Diocese request that this Court enter a judgment in favor of the Parishes and the Diocese and severally and indivisibly against each of the Insurers that have received notice of the Underlying Actions and Claims, and award compensatory damages in an amount to be determined at trial, as well as pre-judgment and post-judgment interest on those amounts of defense costs which each of the Insurers wrongfully refused to pay the Parishes and, to the extent covered as an additional insured, the Diocese, together with attorneys' fees and costs;

3. On Count III, the Parishes and the Diocese request that this Court enter a declaratory judgment in favor of the Parishes and the Diocese against each of the Insurers, declaring that each of the Insurers is severally obligated to indemnify the Parishes, and, to the extent covered as an additional insured, the Diocese, for any judgments and/or settlements attributable to the Underlying Actions and Claims, together with attorneys' fees and costs and pre-judgment interest;

4. On Count IV, the Parishes and the Diocese request that this Court enter a judgment in favor of the Parishes and the Diocese and severally against each of the Insurers that

have received notice of the Underlying Actions and Claims, and award compensatory damages in an amount to be determined at trial, as well as pre-judgment and post-judgment interest on those amounts of indemnity costs which each of the Insurers wrongfully refused to pay the Parishes, and, to the extent covered as an additional insured, the Diocese, together with attorneys' fees and costs;

5. Additionally, the Parishes and the Diocese request such other and further relief as this Court may deem just and proper.

**JURY DEMAND**

The Parishes and the Diocese request a trial by jury on any issue so triable.

Dated: January 19, 2021

Respectfully submitted,

ELSAESSER ANDERSON, CHTD.

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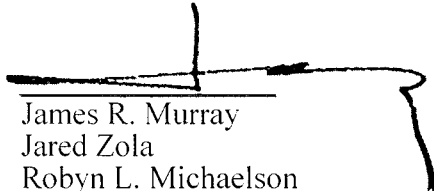
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